

The Global Alliance Against Industrial Aquaculture, 4 January 2018

[Carry on Killing Says RSPCA](#)
[- Updated standards still sanction slaughter of seals across Scotland](#)

The RSPCA is under fire for sanctioning the slaughter of seals on Scottish salmon farms - with Sainsbury's supplier Marine Harvest [leading the killing](#) with over a hundred seals killed since 2011.

Read more via today's Herald: "[RSPCA attacked for fresh support for Scots seal shooting to protect salmon](#)"

Publication of [updated RSPCA welfare standards for farmed Atlantic salmon](#) was due to take place [on 30 November 2017](#) but has been [delayed until 20 February 2018](#). The updated RSPCA standards still permit the killing of seals - although there is now more devil in the details including more rigorous reporting of dead seals and bullets used [1].



marine  harmfest

"When you buy Scottish salmon stamped as RSPCA Assured logo, you can be assured that seals were killed at farms across Scotland," said [Don Staniford](#), Director of the [Global Alliance Against Industrial Aquaculture](#). "Sainsbury's supplier Marine Harvest is [Scotland's #1 seal killer](#) and all of their salmon farms in Scotland are certified via the RSPCA Assured scheme. Shame on Sainsbury's and the RSPCA for sanctioning the slaughter of seals. Don't buy Scottish salmon or you'll have the blood of dozens of seals on your hands!"

The [updated RSPCA standards](#) include records of bullets used and "the reason for the shooting":

- 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 to the ammunition register, if shot by an employee
 - c) details of any animal that has been shot, including:
 - i) the species
 - ii) the time and date of dispatch
 - iii) the location
 - iv) the reason for the shooting
 - v) the number of fish killed before resorting to a lethal method
 - vi) the number of fish on site.
 - * d) If an external marksman is used, an employee must be there to record when a shooting takes place.

Here's the [RSPCA's new seal cull form](#):

Appendix 4	
RSPCA ASSURED SALMON FARMS – 72 HOUR REPORTING FORM – SEAL CULL	
Please fill out this form in full and email to asales@freedomfood.co.uk and malcolm.johnstone@freedomfood.co.uk within 72 hours of the incident	
Membership Number	
Site Name	
Date & Time of Shooting	
Farm SG Licence Number	
Number of seals shot and species (e.g. grey or Common Seal)	
Number and locations of pens affected	
Total number of pens and fish on site at time of predation	
Number of fish killed before last resort shooting took place, and over what time period?	
Location of shooting	
Reasons for shooting (explain why this was considered a last resort)	
How was it ascertained that the damage to the fish was seal-related?	
How did the site manager decide that a seal damage threshold had been reached?	
Details regarding nets (incl. Predator nets)	
Details regarding ADDs (model, transducer positioning on site etc.)	
Any other relevant comments	
Remedial action to prevent further seal attacks	

Signed forby:.....

Date: 01/01/18

The RSPCA have refused to provide a list of salmon farms certified via the RSPCA Assured ([formerly Freedom Foods](#)) scheme. However, during lobbying to the Scottish Parliament in

December 2017, Marine Harvest admitted that 100% of their salmon is certified via RSPCA Assured [2].

Ben Hadfield, Managing Director of Marine Harvest Scotland, [told The Sunday Times](#) in June 2017: "If seals keep attacking the fish, then, like a farmer kills foxes, we shoot them."



Photos: Seals killed near [Marine Harvest's salmon farm in Loch Alsh Special Area of Conservation](#) (download high res images [online here](#) and [online here](#))

Around 70% of Scottish salmon farming production is currently certified via RSPCA Assured generating [an estimated income of close to £1 million](#) per year for the RSPCA [3] - with Marine Harvest (Scotland's largest salmon farming operator [producing 50,000 tonnes of farmed salmon in 2015 from 49 sea farms](#)) accounting for an estimated £400,000 per year [4].



Marine Harvest certainly has a close relationship with the RSPCA - with [former Marine Harvest employee Ian Michie now working for RSPCA Assured](#) and two Marine Harvest staff [represented on the RSPCA's farmed salmon standards technical advisory groups](#) [5]. Here's the cast of Carry On Killing Seals:



RSPCA farmed salmon standards technical advisory groups

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

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

Sainsbury's have a close relationship with both Marine Harvest and the RSPCA. Sainsbury's [stated in 2017](#) that "all our farmed salmon is RSPCA Assured" and referred to "our Scottish supplier Marine Harvest" ([a Norwegian-owned multinational](#) controlled by Norway's [John Fredriksen](#)).

Sainsbury's

About us

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Supporting British suppliers

All of our farmed salmon is RSPCA Assured and comes from Scotland. So customers can be sure the fish are treated well, while supporting British suppliers.

And our salmon also has high levels of long-chain omega 3 fatty acids. Just one portion of our fresh salmon provides the required weekly intake, so helping our customers lead healthier lives.

100%

of our own-brand farmed salmon is
RSPCA Assured

Aquaculture and Fisheries Manager at Sainsbury's, Ally Dingwall, is also [a former employee of Marine Harvest](#) [6]. He [claimed in 2013](#): "Sainsbury's is the largest UK retailer of responsibly sourced RSPCA Freedom Food Salmon".

According to [documents obtained by GAAIA via FOI](#), salmon farms certified by RSPCA Assured ([branded as Freedom Food until 2015/2016](#)) accounted for almost 70% of the seals shot by salmon farms in 2014 (an increase from 26% in 2011 before falling to 52% in 2015) [7]. Based on [the fact that all of Marine Harvest's salmon farms are certified via RSPCA Assured](#) at least a third of all seals killed by salmon farms during 2016 and 2017 (data for the first two quarters is only available) were at RSPCA Assured salmon farms.



Since 2011, Marine Harvest has killed 118 seals shooting up from 5 seals killed in 2013 to 26 in 2016 and 11 thus far in 2017 ([*data for the first two quarters is only available](#)):

[2011](#): 34 seals killed by Marine Harvest Scotland ([459 in total; 241 by fish farms](#))

[2012](#): 16 seals killed by Marine Harvest Scotland ([433 in total; 208 by fish farms](#))

[2013](#): 5 seals killed by Marine Harvest Scotland ([274 in total; 105 by fish farms](#))

[2014](#): 7 seals killed by Marine Harvest Scotland ([205 in total; 80 by fish farms](#))

[2015](#): 19 seals killed by Marine Harvest Scotland ([160 in total](#); [79 by fish farms](#))

[2016](#): 26 seals killed by Marine Harvest Scotland ([97 in total](#); [75 by fish farms](#))

[2017*](#): 11 seals killed by Marine Harvest Scotland (58 in total; 37 by fish farms)

Total (2011-2017): 1686 seals killed (825 seals killed by fish farms; 118 by Marine Harvest)

According to seal-killing data [published online](#) by the Scottish Government (annual data on the killing of seals in Scotland is [available online for the years 2011-2016](#) and the [first six months of 2017](#)), Marine Harvest killed 26 out of the 97 seals reported as killed in [2016](#) (more than any other company and representing 27% of all the seals killed in Scotland in 2016).

Company	Total Seals Killed in 2016
Marine Harvest (Scotland) Ltd	26
Moray Firth Seal Management Group	18
Scottish Sea Farms	14
North and North West Salmon Management Group	13
Cooke Aquaculture Scotland	8
Loch Duart*	6

* Also includes seals killed via the North and North West Salmon Management Group

A total of 15 Marine Harvest salmon farms reported seal kills including sites in Loch Ewe, Torridon, [Greshornish](#), Linnhe, Colonsay, and [Lochalsh](#) - that represents 30% of [Marine Harvest Scotland's 49 salmon farms](#) killing seals. The Marine Harvest salmon farms - all understood to be certified via the [RSPCA Assured/Freedom Food scheme](#) - [reported by the Scottish Government as killing seals in 2016](#) included:

Eilean Grianain (FS1176); Isle Ewe (FS0767); Torridon (FS0814); Greshornish (FS0698); Maol Ban (FS0839); Cairidh (FS0252); Hellisay (FS1261); Ornish (FS0531); Marulaig (FS0865); Linnhe (FS0240); Creag an t Sagairt (FS0605); Kingairloch (FS0241); Camas Glas; Colonsay and Lochlash (sic).

2016 Returns		Quarter 1			Quarter 2			Quarter 3			Quarter 4		
Licence No:	Licence Name:	Site	Common	Grey	Site	Common	Grey	Site	Common	Grey	Site	Common	Grey
WI14/2016	Marine Harvest (Scotland) Ltd		0	0		0	0	0 Hellisay FS1261	0	2		0	1
"	Marine Harvest (Scotland) Ltd		0	0		0	0	0 Ornish FS0531	0	2			
"	Marine Harvest (Scotland) Ltd		0	0		0	0	0 Marulaig FS0865	0	1			
SW07/2016	Marine Harvest (Scotland) Ltd	Eilean Grianain FS1176	1	0		0	0		0	0		0	0
WS06/2016	Marine Harvest (Scotland) Ltd		0	0		0	0		0	0		2	0
WS16/2016	Marine Harvest (Scotland) Ltd	Isle Ewe FS0767	0	2		0	0		0	0		0	0
"	Marine Harvest (Scotland) Ltd	Torridon FS0814	1	0		0	0		0	0			
WS21/2016	Marine Harvest (Scotland) Ltd	GRESHORNISH FS0698	0	1	Cairidh FS0252	0	2	Linnhe FS0240	1	0	Lochlash	1	1
"	Marine Harvest (Scotland) Ltd		0	0		0	0	0 Maol Ban FS0519	0	1	Camas Glas	1	1
"	Marine Harvest (Scotland) Ltd		0	0		0	0	0 Creag an t Sagairt FS0605	0	1	Kingairloch FS0241	0	1
"	Marine Harvest (Scotland) Ltd	MAOL BAN FS0839	1	0		0	0	0 Kingairloch FS0241	0	1	Colonsay	0	1

Data [published online by the Scottish Government in September 2017](#) - for the first two quarters of 2017 (Q3 2017 data is expected soon) - reveal that Marine Harvest has killed 11 seals at seven different sites (Polle na Gille, Bagh dail nan Cean, Ardnish, Lochlash, Camas

Glas, Kingainloch and Colonsay) during 2017 representing 19% of the total seals killed in Scotland:

2017 Returns		Quarter 1			Quarter 2		
Licence No:	Licence Name:	Site	Common	Grey	Site	Common	Grey
WS06/2017	Marine Harvest (Scotland) Ltd	Polle na Gille	1	0	Bagh dail nan Cean	2	0
"	Marine Harvest (Scotland) Ltd	Bagh dail nan Cean	0	1			
WS21/2017	Marine Harvest (Scotland) Ltd	Ardnish	0	1	Lochlash	1	1
"	Marine Harvest (Scotland) Ltd				Camas Glas	1	1
"	Marine Harvest (Scotland) Ltd				Kingainloch	0	1
"	Marine Harvest (Scotland) Ltd	MAOL BAN FS0839			Colonsay	0	1

Here's site specific data for the 19 seals killed by Marine Harvest in [2015](#):

2015 Returns		Quarter 1			Quarter 2			Quarter 3			Quarter 4		
Licence No:	Licence Name:	Site	Common	Grey	Site	Common	Grey	Site	Common	Grey	Site	Common	Grey
WI14/2015/W/01	Marine Harvest (Scotland) Ltd		0	0	FS1261	0	1		0	0	FS1263	0	2
SW07/2015	Marine Harvest (Scotland) Ltd		0	0		0	0		0	0		0	0
WS06/2015	Marine Harvest (Scotland) Ltd	FS0629	0	1		0	0		0	0		0	0
"	Marine Harvest (Scotland) Ltd	FS0859	3	0		0	0		0	0		0	0
WS16/2015	Marine Harvest (Scotland) Ltd		0	0		0	0		0	0		1	0
WS21/2015	Marine Harvest (Scotland) Ltd	FS0602	0	4	FS0212	3	0	FS0602	1	0	FS0237	1	0
"	Marine Harvest (Scotland) Ltd		0	0	FS0602	0	1		0	0		0	0
"	Marine Harvest (Scotland) Ltd		0	0	FS0519	0	1		0	0		0	0

Here's site specific data for the 16 seals killed by Marine Harvest in [2012](#):

2012 Returns		Quarter 1			Quarter 2			Quarter 3			Quarter 4		
Licence No:	Licence Name:	Site	Common	Grey	Site	Common	Grey	Site	Common	Grey	Site	Common	Grey
WI06/2012/W	Marine Harvest	FS/1033			FS/0502		1						
"	Marine Harvest	FS/0502											
WI07/2012/W	Marine Harvest												
WI13/2012/W	Marine Harvest Ltd - Hellisay												
WS16/2012/W	Marine Harvest										FS/1084		1
WS21/2012/W	Marine Harvest	FS/0602	3	3				FS/0237	1		FS/0015	1	
"	Marine Harvest	FS/0519		1				FS/0240	1	1	FS/0249	1	

Here's site specific data for the 34 seals killed by Marine Harvest in [2011](#):

2011 Returns		Quarter 1			Quarter 2			Quarter 3			Quarter 4		
Licence No:	Licence Name:	Site	Common	Grey	Site	Common	Grey	Site	Common	Grey	Site	Common	Grey
WI6/2011/W	Marine Harvest (Lewis & Harris)	FS/1042						FS/0954				1	
WI7/2011/W	Marine Harvest (Uist & Benbecula)												
WS21/2011/W	Marine Harvest combined	FS/0212		1	FS/0212		1	FS/0413		3	4	FS/0249	1
"	Marine Harvest combined	FS/0241		1	1	FS/0240	1	1	FS/0252		1	FS/0413	1
"	Marine Harvest combined	FS/0249			1	FS/0244	1	FS/0519			2	FS/0015	1
"	Marine Harvest combined	FS/0413		1	1							FS/0247	1
"	Marine Harvest combined											FS/0605	1
"	Marine Harvest combined											FS/0252	1
"	Marine Harvest combined											FS/0519	1
"	Marine Harvest combined											FS/0602	1

In October 2017, Marine Harvest [posted photos of an RSPCA event at the Palace of Westminster](#) showcasing their [RSPCA Assured](#) farmed salmon:



In November 2017, GAAIA wrote to [Theresa Villiers MP \(as host of the event\) and Michael Gove, Secretary of State for Environment, Food and Rural Affairs \(a speaker at the event\)](#) asking them to intervene to end the slaughter of seals at Marine Harvest salmon farms and to ask the RSPCA to withdraw RSPCA Assured certification from seal killing salmon farms.



GAAIA also wrote to the RSPCA asking that Marine Harvest and other salmon farming companies slaughtering seals are suspended immediately from the [RSPCA Assured/Freedom Food certification scheme](#).



In December 2015, GAAIA protested outside Buckingham Palace and delivered [a letter to Her Majesty the Queen](#) (as [royal patron of the RSPCA](#)) asking her to intervene to end the slaughter of seals on RSPCA Assured salmon farms in Scotland.



Watch a video report shot outside the RSPCA's head office - [online here](#)



Watch a video report from Don Staniford via "[Marine Harvest: Stop Shooting Seals!](#)":



Contact:

Don Staniford (07771 541826 and dstaniford@gaaia.org)

Background News:

["RSPCA attacked for fresh support for Scots seal shooting to protect salmon"](#)
[Press Release: "RSPCA in firing line over Marine Harvest's seal-killing spree in Scotland - 118 seals killed by Marine Harvest's RSPCA Assured farms since 2011"](#)
[The Scotsman: "Fish farms kill more seals as industry tries to save salmon"](#)
[Sunday Times: "Fish farms under fire for seal death toll"](#)
[UK seal population under threat for salmon-farming industry](#)
[Fish farms shoot dozens of seals to save salmon bound for 'ethical' Waitrose and M&S supermarkets](#)
["Marine Harvest: Scotland's #1 Seal Killer"](#)
[Sunday Times: "Seals shot to save Waitrose salmon"](#)
[SSPO seeks clarity over seal shooting export threat](#)
[Herald: "US warning over continued killing of seals by Scots fish farms"](#)
[Seal-killing salmon farms caught in cross-hairs of Scottish Parliament](#)
[Take Scotland's Seals Out of the Cross Hairs!](#)
["All At Sea: Seal-Killing Salmon Farms"](#)
["The Two Billion Dollar Salmon Ban"](#)
["Sunday Herald: "Scotland's 'trigger-happy' salmon farmers risk losing £200m US export market"](#)
["Seal of Approval for U.S. Ban on Salmon"](#)
["Staniford calls on RSPCA to drop Marine Harvest, Scottish Sea Farms, SSC"](#)
[Press Release: "Closing the Net On 'Seal-Friendly' Scottish Salmon - last orders on the RSPCA's abuse of 'last resort' killing of seals?"](#)
[Herald: "RSPCA defend record as anti-seal cull campaigners allege salmon farms are not 'last resort' killers"](#)
[Dear RSPCA, please wash the blood of Scottish seals off your hands!](#)
[Video Message to the RSPCA - stop the killing of seals on salmon farms!](#)
[Photos: RSPCA Assured Seal Killers!](#)
["Anti-salmon farm campaigners petition Queen over RSPCA's seal-shooting sanction"](#)
[Petition to the RSPCA: End your support for the killing of Scottish seals!](#)
[Press Release: "RSPCA Savaged Over Seal Killing in Scotland"](#)
[Letter to Her Majesty the Queen](#)
[RSPCA Assured Seal Killers!](#)
[RSPCA upsets people by saying seal shooting is OK](#)
[RSPCA attacked for its policy on seal shooting](#)
[RSPCA: Seals should be shot as an 'absolute last resort' to protect salmon](#)
[RSPCA warns Scottish salmon farmers to shoot fewer seals](#)



High resolution images:



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Download PDFs [online here](#) and [online here](#)




marine harmfest

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Notes to Editors:

[1] In August 2017 the RSPCA [published an update of their welfare standards for farmed Atlantic salmon](#) - with the new standards [scheduled to come into effect on 30 November 2017](#):



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Updated RSPCA welfare standards for salmon

Home > News > **Updated RSPCA welfare standards for salmon** 1 of 2 pages



- New standards regarding the welfare of wild caught and cultivated cleanerfish used as biological controls for the removal of sea lice
- Updated standards on protecting salmon from predators, including seals
- New standards around electronarcosis/electrocution followed by bleeding
- New requirements regarding slaughter/killing, including cage-side harvest.

The review of the standards was carried out in consultation with the industry, veterinary profession and welfare research sector.

***UPDATE* The publication of the welfare standards for farmed Atlantic salmon has been delayed until 20 February 2018.**

The RSPCA has announced an update to its welfare standards for farmed Atlantic salmon.

New and amended standards include:

- New standards around the removal of sea lice. Changes include a requirement for mechanical sea lice removal technologies to be risk assessed against the impact they may have on the welfare of the fish prior to each use of the technology

The new standards will come into effect - and must be met by RSPCA Assured members - from Thursday 30 November 2017 unless otherwise stated in the standards.

Information about these changes was sent to relevant RSPCA Assured members on Wednesday 30 August.

Date: 31 Aug 2017

However in December 2017 the RSPCA [announced a delay on the new standards until 20 February 2018](#):

Publication of updated RSPCA welfare standards for salmon delayed

Home > News > Publication of updated RSPCA welfare standards for salmon delayed

The updated RSPCA welfare standards for farmed Atlantic salmon now must be met by RSPCA Assured members from Tuesday 20 February 2018.

Publication was due to take place on Thursday 30 November 2017. Now the new standards are due to come into effect from Tuesday 20 February 2018, unless otherwise stated in the standards.

All RSPCA Assured members affected by this change will be contacted.

If you have any questions about this change, please don't hesitate to contact us.



Updated RSPCA welfare standards for salmon

Find out more



RSPCA welfare standards

Find out more



Good animal welfare

Find out more

Date: 05 Dec 2017

The [RSPCA's update to their welfare standards for farmed Atlantic salmon](#) includes:

Protection from other animals



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

However, at the present time, it is acknowledged that in some exceptional cases, and as a last resort only, and where the welfare of the fish has been compromised, i.e. they have been injured/attacked, it may be necessary to use a lethal deterrent (i.e. shoot) a seal to protect the welfare of the fish.

The situation leading up to a last resort will be reached when the following non-lethal actions have been carried out in full:

- **nets are adequately tensioned**
- **top nets are secured to prevent ingress by seals into the enclosure**
- **any dead fish have been regularly removed**
- **fully working ADDs/ASDs have been deployed where they are permitted for use**
- **predator nets/seal curtains/screens have been deployed where it is appropriate to do so.**

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

HP 7.0 * The shooting of seals is not permitted under normal circumstances. Seals must not be shot other than in exceptional circumstances (see information box below) and as a last resort only when all non-lethal deterrents have been deployed.



Only the following situations are deemed to be 'exceptional circumstances' (NB if all the relevant RSPCA standards are applied in full, it is expected that such circumstances will be rare):

- 1. Sudden damage to nets, ADD systems, and other equipment used to protect the fish from seals (e.g. due to extreme weather) and following which a seal is found to be in the act of attacking the salmon (NB repair of all systems needs to be undertaken immediately on detecting the damage).**
- 2. Emergency situations where a seal has actually entered the salmon cages and is in the act of attacking the fish within.**

HP 7.0.1 * If a seal is shot then producers must:

- a) be able to provide evidence that standards HP 7.2 and 7.15 have been applied, and
- b) implement standards HP 7.19 and 7.19.1 in full.

HP 7.2 The producer must:

- a) use all reasonable non-lethal methods of control to protect fish from other animals
- * b) fully detail the methods used in the Predator Control Plan
- * c) be able to clearly demonstrate that any lethal methods used were only used as a last resort, where all non-lethal methods have failed.

HP 7.9 * Where predator nets cannot be deployed for animal welfare reasons, the precise nature of that animal welfare reason must be documented and recorded.

HP 7.11 * If an attack takes place on a site with no history of previous attacks:

- a) operatives at the site must put into place extra observation procedures of the site for at least seven days to ensure that the welfare of the fish is not going to be compromised by further attacks
- b) there must be a written record of the extra observations described in a)
- c) an ADD must be deployed without delay if a further attack takes place at the site, including within the seven day observation period.

HP 7.15 * Prior to being shot, the individual seal responsible for causing the fish mortality, injuries and compromised welfare on the site must be positively identified.

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
- * f) predator nets must be checked at least weekly and any accidentally caught animals, including birds, recorded and these records made available to the RSPCA Assured Assessor and RSPCA Farm Livestock Officer on request.

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 to the ammunition register, if shot by an employee
- c) details of any animal that has been shot, including:
 - i) the species
 - ii) the time and date of dispatch
 - iii) the location
 - iv) the reason for the shooting
 - v) the number of fish killed before resorting to a lethal method
 - vi) the number of fish on site.
- * d) If an external marksman is used, an employee must be there to record when a shooting takes place.

HP 7.19.1 * For members of the RSPCA Assured Scheme, all required details relating to seal shootings must be provided to RSPCA Assured in the required format (see Appendix 4) within 72 hours of the shooting having taken place; details must include information relating to standard HP 7.19.



RSPCA Assured will review the information relating to standard HP 7.19.1 and telephone the site manager to establish further details and inform decisions around compliance. The situation may result in a visit from an RSPCA Assured Assessor or a member of the RSPCA Farm Animals Department, which will be at cost to the producer.

Appendix 4

RSPCA ASSURED SALMON FARMS – 72 HOUR REPORTING FORM – SEAL CULL

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

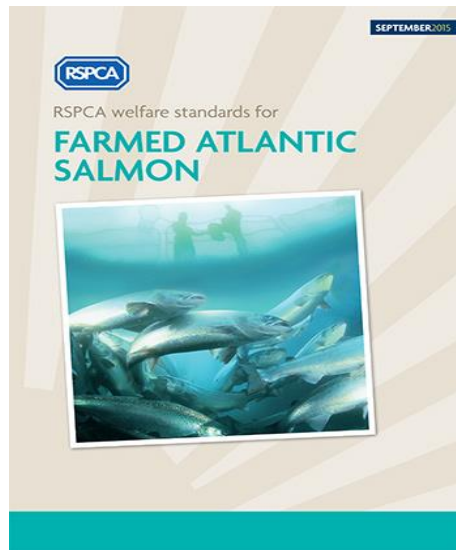
Membership Number	
Site Name	
Date & Time of Shooting	
Farm SG Licence Number	
Number of seals shot and species (e.g. grey or Common Seal)	
Number and locations of pens affected	
Total number of pens and fish on site at time of predation	
Number of fish killed before last resort shooting took place,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

Signed for

Date: 01/01/18

Read in full [online here](#)

For more details on the [RSPCA's welfare standards for farmed Atlantic salmon](#) (September 2015) please read [online here](#)



Here's the relevant [sections of the RSPCA's standards](#) sanctioning seal-killing:

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 carcasses 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](#)

For more background on RSPCA Assured/Freedom Food salmon farms killing seals read [RSPCA/Freedom Food & Seal Killing FOI Backgrounder \(May 2017\)](#) and [RSPCA Assured Seal Killers!](#)

[2] Here's an email from Marine Harvest's Managing Director Ben Hadfield to MSPs and MPs:

From: MacKay, Jayne <Jayne.MacKay@marineharvest.com>

Sent: Thursday, December 21, 2017 10:22:56 AM

To: Adam G (George), MSP; Adamson C (Clare), MSP; Allan A (Alasdair), MSP; Arthur T (Tom), MSP; Baillie J (Jackie), MSP; Baker C (Claire), MSP; Balfour J (Jeremy), MSP; Ballantyne M (Michelle), MSP; Beamish C (Claudia), MSP; Beattie C (Colin), MSP; Bibby N (Neil), MSP; Bowman B (Bill), MSP; Briggs M (Miles), MSP; Brown KJ (Keith), MSP; Burnett A (Alexander), MSP; Cameron D (Donald), MSP; Campbell AE (Aileen), MSP; Carlaw J (Jackson), MSP; Carson F (Finlay), MSP; Chapman P (Peter), MSP; Coffey W (Willie), MSP; Cole-Hamilton A (Alex), MSP; Constance A (Angela), MSP; Corry M (Maurice), MSP; Crawford B (Bruce), MSP; Cunningham R (Roseanna), MSP; Davidson R (Ruth), MSP; Denham A (Ash), MSP; Dey G (Graeme), MSP; Doris B (Bob), MSP; Dornan J (James), MSP; Dugdale K (Kezia), MSP; Ewing A (Annabelle), MSP; Ewing F (Fergus), MSP; Fabiani L (Linda), MSP; Fee M (Mary), MSP; Findlay N (Neil), MSP; Finnie J (John), MSP; FitzPatrick J (Joe), MSP; Forbes K (Kate), MSP; Fraser M (Murdo), MSP; Freeman J (Jeane), MSP; Gibson K (Kenneth), MSP; Gilruth J (Jenny), MSP; Golden M (Maurice), MSP; Gougeon M (Mairi), MSP; Grahame C (Christine), MSP; Grant R (Rhoda), MSP; Gray I (Iain), MSP; Greene J (Jamie), MSP; Greer R (Ross), MSP; Griffin M (Mark), MSP; Halcro Johnston J (Jamie), MSP; Hamilton R (Rachael), MSP; Harper E (Emma), MSP; Harris A (Alison), MSP; Harvie P (Patrick), MSP; Haughey C (Clare), MSP; Hepburn J (Jamie), MSP; Hyslop F (Fiona), MSP; Johnson D (Daniel), MSP; Johnstone A (Alison), MSP; Kelly J (James), MSP; Kerr L (Liam), MSP; Kidd B (Bill), MSP; Lamont J (Johann), MSP; Lennon M (Monica), MSP; Lochhead R (Richard), MSP; Lindhurst G (Gordon), MSP; Lochhead R (Richard), MSP; Lockhart D (Dean), MSP; Lyle R (Richard), MSP; MacDonald A (Angus), MSP; MacDonald G (Gordon), MSP; Macdonald L (Lewis), MSP; MacGregor F (Fulton), MSP; Macintosh K (Ken), MSP; Mackay D (Derek), MSP; Mackay R (Rona), MSP; Macpherson B (Ben), MSP; Maguire R (Ruth), MSP; Marra J (Jenny), MSP; Martin G (Gillian), MSP; Mason J (John), MSP; Mason T (Tom), MSP; Matheson M (Michael), MSP; McAlpine J (Joan), MSP; McArthur L (Liam), MSP; McDonald M (Mark), MSP; McKee I (Ivan), MSP; McKelvie C (Christina), MSP; McMillan SM (Stuart), MSP; McNeill P (Pauline), MSP; Mitchell M (Margaret), MSP; Mountain E (Edward), MSP; Mundell O (Oliver), MSP; Neil A (Alex), MSP; Paterson G (Gil), MSP; Rennie W (Willie), MSP; Robison S (Shona), MSP; Ross G (Gail), MSP; Rowley A (Alex), MSP; Rumbles M (Mike), MSP; Ruskell M (Mark), MSP; Russell MW (Michael), MSP; Sarwar A (Anas), MSP; Scott J (John), MSP; Scott T (Tavish), MSP; Simpson G (Graham), MSP; Smith EA (Elaine), MSP; Smith E (Elizabeth), MSP; Smyth C (Colin), MSP; Somerville S (Shirley-Anne), MSP; Stevenson S (Stewart), MSP; Stewart A (Alexander), MSP; Stewart D (David) MSP; Stewart K (Kevin), MSP; Sturgeon N (Nicola), MSP; Swinney J (John), MSP; Todd M (Maree), MSP; Tomkins A (Adam), MSP; Torrance D (David), MSP; Watt M (Maureen), MSP; Wells A (Annie), MSP; Wheelhouse P (Paul), MSP; White S (Sandra), MSP; Whittle B (Brian), MSP; Wightman A (Andy), MSP; Yousaf H (Humza), MSP

Cc: Roberts, Ian

Subject: Newsletter from Marine Harvest

Good morning,

Please find attached our first newsletter. We hope you enjoy it and if you have any queries please do not hesitate to get in touch.

Best wishes for the Festive Season,

Regards



Ben Hadfield
Managing Director

Jayne MacKay
PA to MD / Communications Assistant
MARINE HARVEST SCOTLAND LTD

MOBILE: +44 7717 802370
DIRECT: +44 1397 715061
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OFFICE: Stob Ban House
Glen Nevis Business Park
Fort William, PH33 6RX
Scotland, UK



Marine Harvest Update - December 2017

Welcome to an update about some of our work around the Highlands and Islands. We are delighted to report that farmed Scottish salmon continues to be in high demand around the world. Exports for the first nine months of 2017 rose by 56% on last year and we are proud to be part of such a successful industry. The festive season is one of our busiest times with sales of smoked and whole salmon to the UK market rising significantly in December and adding to the challenges of overcoming the winter weather to get the salmon to market.

Ben Hadfield, Managing Director

About Marine Harvest Scotland

We are the largest salmon farming company in Scotland, producing around 60,000 tonnes in 2017.

We were the first company in Scotland to farm Atlantic salmon and celebrated our 50th anniversary in 2015.

We have more than 1,300 staff and operate four hatcheries, five freshwater loch sites and 47 sea farms, situated in the Western Isles, Skye, Argyll, Wester Ross and Lochaber. Live fish are harvested at Mallaig and processed at the Blar Mhor plant in Fort William.

We produce salmon products for the consumer market at our processing plant in Rosyth.

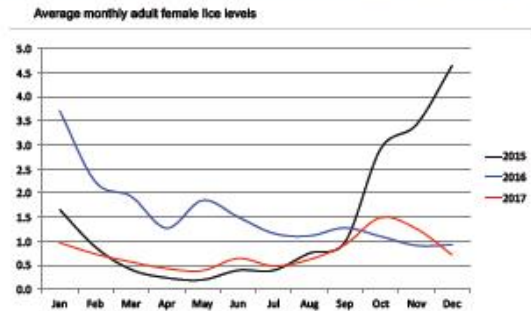
All our farms, harvest station and processing plant are audited and approved under the RSPCA Freedom Food animal welfare scheme.

Our capital spend in 2017 is around £69m - the highest in the Marine Harvest Group. Our turnover is approximately £442m and our 2017 wage bill is £47m.

TACKLING THE SEA LICE CHALLENGE

Rising sea temperatures mean that combatting sea lice is an ongoing challenge for the fish farming industry but one we are working hard to minimise and manage.

Dramatic media headlines give the impression that Scotland's salmon farms are swarming with sea lice. In fact all fish farms must carry out a weekly count of sea lice which naturally occur in the sea and are found on wild and farmed salmon. If an average of three adult female sea lice per fish or more is found it must be reported to Marine Scotland's Fish Health Inspectorate. The fish farm then works closely with the Inspectorate to implement an increased monitoring regime and an action plan to reduce the number of lice.



We focus on natural solutions to combat sea lice. Research is ongoing but measures we've already been investing in heavily include:

- Cleaner fish which are natural predators of sea lice.
- Hydro licers and thermo licers to douse the salmon in fresh and warm water and rinse away the lice.
- Skirts around our salmon pens which create a barrier and stop lice getting to the fish.
- Our revolutionary new well boat which makes freshwater from seawater using reverse osmosis to bathe the salmon being transported and wash off any sea lice.

FEED PLANT

Work on our new £93 million fish feed plant at Kyleakin on Skye is progressing well. 55 people will be employed there when it opens in Autumn next year to produce feed for our farms in Scotland as well as Ireland, Norway and the Faroe Islands.

We're delighted that our first appointment to the feed plant team is a local man returning to the area. Engineer Robbie Murray went to Plockton High School before studying at Edinburgh University. He and wife Hazel, a GP, have moved back to Plockton.





FARM FOCUS ISLE OF MUCK

At two miles long by one mile wide, Muck is the smallest of The Small Isles which lie off the West Coast. We opened a salmon farm here in 2014 which also involved building five houses to accommodate staff.

Manager Robert Wyvill lives on the island with his wife Hazel and three young sons. Before moving to Muck in 2014 to help set up the salmon farm Robert worked at three of our other farms and has worked his way up from farm technician to manager.

Tell us a bit about the salmon farm



"Muck is one of our new series of "open sea" farms and the sea conditions are ideal for growing salmon. Clear waters around the island combined with the strong tidal flows mean our fish flourish with very little intervention. We have ten cages of salmon and nine people work on the farm."

What's the hardest part of the job?

"The hardest part of working in Muck is the winters when the sea has a fairly big swell and calm days are very rare.

"We have a camera system which is linked from the feed barge to the shore base so if we can't get out to the barge we can still feed. In the last growing cycle we were able to achieve zero missed days feeding due to weather which is a great result.

"Muck is certainly the most challenging site I have worked on and that means the staff also have to be trained to a higher degree than normal so that if things go wrong they can deal with it. All skippers hold powerboat advanced as a minimum, one of the team has his yacht master offshore qualification and another does engineering training in Glasgow in his time off."

And what's the best part of the job?

"It's definitely being part of a close community. There are only 40 people living here and everyone celebrates each other's birthdays and we all give out presents at Christmas. It is a fantastic place which I am glad to call my home.

"We've also been able to help out with our landing craft which takes our staff back and forth to Mallaig and in the winter takes supplies from the mainland when the ferry can't get in. I think we have delivered the Christmas shopping to Muck every year since the farm opened!"

THE NEXT GENERATION

Two Lochaber youngsters became our latest apprentices in the summer. Former Lochaber High School pupils Emily Connolly (18) and Tommy Chisholm (16) began their four year modern apprenticeships with work experience around our farms before their first study block at Inverness College UHI.

We started our modern apprentice programme in 2013 to help address the significant challenge of the so-called "lost generation" in the Highlands and Islands. Young people tend to leave for college and university and often don't return. Now out of a workforce of almost 700 across the Highlands and Islands, 130 of our staff members are under 25. To date over 25 employees have completed the SVQ Level 2 or 3 modern apprentice programme. Five of our apprentices are now in management positions - one recently became our youngest ever assistant farm manager - and two have won LANTRA Apprentice of the Year awards.



If you would like more information or a visit to one of our farms please get in touch with Jayne MacKay on 01397 715061 or jayne.mackay@marineharvest.com.

Download as a PDF [online here](#)

[3] A report - "[RSPCA Assured Certification of Scottish Farmed Salmon](#)" - published by Salmon & Trout Conservation Scotland in June 2017 included:

RSPCA Assured charges for certification

- 4.1 In the year to December 2015, Freedom Food Limited made £2.4m, with assurance scheme licence fees and assessments amounting to £2.0 million. Freedom Food Limited's annual report states that 233 million fish benefitted from the scheme in 2015, as against 283 million in 2014⁹. Its expenditure in 2015 was also given as £2.4 million.
- 4.2 67% of Scottish farmed salmon are said to be covered by the RSPCA Assured scheme¹⁰. In 2012, a higher figure of 78% of Scottish salmon was claimed to be farmed to the RSPCA's higher welfare standards¹¹.
- 4.3 It is also important to note that all certified fish farms are charged to be RSPCA Assured. Freedom Food Limited charges a £119 for new membership of the RSPCA Assured scheme, a £486 annual fee per fish farm site and a charge of 0.875p per kg of the value of product sold (gutted weight).
- 4.4 Based upon annual Scottish salmon production figures given in the Scottish Fish Farm Production Survey 2015¹² of 171,722 tonnes in 2015, from 250 seawater sites, these charges imply a total charge levied upon Scottish salmon farming of between £800,000 and £900,000 per year.

[4] The RSPCA has stubbornly refused to name which salmon farms are certified via the RSPCA Assured (formerly Freedom Food) scheme. A report - "[RSPCA Assured Certification of Scottish Farmed Salmon](#)" - published by Salmon & Trout Conservation Scotland in June 2017 included:

Which farms are RSPCA Assured?

- 5.1 Although it would perhaps seem obvious that for a certification scheme of any sort to be able to promote good practice, in whatever field, it must be possible to identify which farms are certified and which are not, in the hope that consumers ensure that purchases are only made from certified farms, there is no published list of certified Scottish salmon farms.
- 5.2 In 2012, Freedom Food Limited declined to provide a list of certified farms stating that *"specific details relating to our members is deemed as confidential within our membership agreement and we are only permitted to release such information if it is deemed to be in the member's interest to do so. Under the circumstances I believe it would be inappropriate for Freedom Food to furnish you with the information you have requested"*¹³.
- 5.3 That appears to remain the position with RSPCA Assured farms. There is no list of certified farms on either the RSPCA or RSPCA Assured websites.
- 5.4 Although the RSPCA Welfare Standards emphasise proper record keeping, documentation relating to farms visits, certification, audits and indeed the identity of particular farms accredited under the RSPCA Assured scheme is not published making the certification of farms under the RSPCA Assured scheme opaque at best.

Freedom Food's General Manager Clive Brazier told GAAIA in January 2015:

From: Clive Brazier [mailto:clive.brazier@freedomfood.co.uk]
Sent: 29 January 2015 15:57
To: salmonfarmingkills@gmail.com
Subject: E Mail Contact

Dear Don,

Thank you for your emails of the 15 and 16 January that were passed onto me.

Approximately 70 per cent of farmed Scottish Salmon is produced under Freedom Food. You will appreciate that due to data protection, we are unable to provide you with a list of Freedom Food approved salmon members.

The number of seals shot on our farms, as a last resort, has significantly reduced over the last seven years and continues to do so year on year. We are unable to disclose the figures as they are submitted to us by our members, in confidence, for the benefit of developing the scheme.

Of course the killing of one seal is still one too many and we are working towards getting this figure down to zero.

Kind regards

Clive Brazier

General Manager www.freedomfood.co.uk

Freedom Food is the RSPCA's farm assurance and food labeling scheme dedicated to farm animal welfare.
www.freedomfood.co.uk

[In July 2016, [Clive Brazier became chief executive of RSPCA Assured](#)]

However, we know by [Marine Harvest's own admission](#) in December 2017 that all of Marine Harvest's 49 sea farms are certified via RSPCA Assured and we know that Marine Harvest produced "[more than 50,000 tonnes](#)" of farmed salmon in Scotland in 2015.

According to the latest Scottish Government '[Scottish Fish Farm Production Survey 2016](#)' published in September 2017, a total of 171,722 tonnes of farmed salmon was produced in 2015 (predicted to rise to 177,202 tonnes in 2017).

Hence if Marine Harvest produced 57,000 tonnes in 2015 that would have equated with a third of Scottish farmed salmon production.

Moreover, if only 70% of Scottish farmed salmon is certified via RSPCA Assured but all of Marine Harvest's salmon farms are accredited then Marine Harvest could account for almost half of all RSPCA-certified farmed salmon production (70% of 171,722 tonnes is 120,205 tonnes).

Since the RSPCA's income from salmon farming is [estimated at between £800,000 to £900,000 per year](#) then Marine Harvest could account for ca. £400,000.

[5] Fish Update [reported](#) in April 2016:

"Ian Michie has joined the RSPCA as a Farm Livestock Officer carrying out inspections of RSPCA Assured farmed fish producers in Scotland". He was a salmon farm manager for Marine Harvest for 18 years and was aquaculture manager with Young's Seafood for 11 years."

Fish Farmer magazine [reported](#) in May 2016:

Rest Assured

RSPCA officers engage with industry

Good fish welfare equals good quality so there has always been a commercial reason for salmon farmers to look after their stock, says the RSPCA's Ian Michie.

'Survival and growth meant welfare, it was the same thing. But over time that has changed...welfare is an additional part in terms of the wellbeing of the animal, not just part of the production process but a moral obligation.'

Michie is a new farm livestock officer for the RSPCA but he was a fish farm manager for Marine Harvest for many years so knows the industry inside out.

He will be carrying out assessments on salmon and trout farms approved under the charity's farm assurance scheme – RSPCA Assured, and was one of two officers appointed last November.

The second, Eoina Rodgers, has joined the RSPCA's farm animals department as a scientific officer specialising in aquaculture.

Both are based in Scotland where the majority of the RSPCA Assured salmon and trout producers are based.

Michie, who lives in Ardanmurchan, was in Orkney when Fish Farmer caught up with him. His role involves monitoring farms to give additional assurance that standards are being maintained to the RSPCA Assured, previously called Freedom Food, ethical food label.

His visits, which take place between annual inspections and are unannounced, provide a two-way line of communication.

'Unlike an inspector, who has to objectively assess against the written standard, I can engage in discussion about what the standard is and why it's there.'

He has been to a lot of farms since November and seen quite a few people he worked with in the industry. They aren't surprised to see him in his new role, he says, because welfare and

farming go hand in hand.

When the Farm Animal Welfare

Council produced their recommendations for aquaculture



www.fishfarmer-magazine.com

“It's not just part of the production process but a moral obligation”

Left: Eoina Rodgers. Above: Ian Michie



in 1996 the industry took up the recommendations with enthusiasm, said Michie.

'There were so many detractors at the time and farmers wanted to show that they actually did care about their stock and they saw that [the recommendations] as a way of doing it.' But they didn't need to be taught about welfare.

Since the 1990s, the RSPCA has been developing and producing welfare standards for farm animals, with Atlantic salmon and rainbow trout the most recent. A significant majority of salmon farmed in the UK is reared to the RSPCA's strict welfare standards.

Michie said the salmon standards, started in about 2002, focused not just on the prevention of cruelty but the promotion of welfare – 'health and welfare is so much the foundation of any livestock farming'.

He worked Marine Harvest for 18 years, joining the technical department in 1997, and sat on its technical committee.

'I was the interface between key customers and production and that was partly why I got involved in the RSPCA. Marine Harvest wanted to develop their credentials in welfare and I was involved from the early days.'

Then he moved to Young's Seafood, where he was aquaculture manager for 11 years, and maintained an interest in the development of the welfare standards, serving on the Global Gap technical committee too.

He agrees there can be confusion surrounding the various different standards and says when he turns up at farms he is there to visit, not audit.

'A lot of the staff find that difficult because they're so used to being audited! I'm trying to get them to recognise that monitoring visits are a two-way thing.'

Eoina Rodgers also joined the RSPCA in November. Originally from the Outer Hebrides, she studied marine science at SAMS and previously worked for Scottish Natural Heritage as a marine policy and advice officer.

Part of her role is to feed into the welfare standards, not just for salmon and trout, but eventually for wrasse and lumpfish too.

'That's taking up a lot of my time at the moment, doing research, to develop a standard for them,' she said. 'I'm trying to visit as many people as possible who have hatcheries for cleaner fish and gather as much information as possible...asking the producers for advice and trying to ascertain what welfare concerns they have that we might not have picked up on yet.'

She said the RSPCA relies on communication with farmers for its standards – 'they're our eyes on the ground' – and hears about emerging issues 'first hand from the industry'.

One of these was fungus in freshwater and last month she was organising an industry workshop to address the problem.

'This will be a fact-finding workshop, with representatives from the industry, to identify what we know about fungus in freshwater, such as the causative factors, and hopefully conducting risk assessments and identifying research priorities.'

[6] "Animal welfare is vital to us at Sainsbury's – and that applies as much in water as it does on land. That's why all our farmed salmon is RSPCA Assured," [claimed Sainsbury's in 2017](#) who also referred to "our Scottish supplier Marine Harvest".

In 2015, Marine Harvest [poached a £100 million Sainsbury's contract from Young's Seafood \(racking up huge losses in the process\)](#).

According to [Fisheries Information Service](#):

Title: Aquaculture and Fisheries Manager

Name: Mr Ally Dingwall

Email: ally.dingwall@sainsburys.co.uk

Phone: +44 207 695 2414



Ally Dingwall joined Sainsbury's in September 2008 as Aquaculture and Fisheries Manager with responsibility for fish sourcing policy in line with Sainsbury's business commitment to sourcing with integrity.

Ally joined Sainsbury's from Huon Aquaculture in Australia where he was General Manager for Value Added Processing.

He previously worked for Uniq plc, Pinneys of Scotland and Marine Harvest in a variety of production, technical and procurement roles.

In 2008, The Guardian [reported](#): "The retailer Sainsbury's has also promised it will phase out suppliers associated with seal shooting". Andy Ottaway of the Seal Protection Action Group [said in a press release](#): "We are calling on Sainsbury's and other major retailers to use their considerable purchasing power to persuade Scottish salmon producers to stop shooting our seals".

Intrafish [reported](#) back in 2010:



Marine Harvest, Sainsbury's to find alternative to killing seals

Marine Harvest has partnered with retailer Sainsbury's and NGOs to find solutions to stop the killing of seals at fish farms.

by IntraFish Media
September 27th, 2010 05:07 GMT Updated May 8th, 2016 16:52 GMT

The world's largest salmon farmer and U.K. retailer Sainsbury's are joining forces with animal welfare groups to bring to an end the killing of problem seals at salmon farms, as quickly as possible.

In what is believed to be a world first, Marine Harvest, the world's largest salmon farmer will work with the Seal Protection Action Group as part of the newly formed Salmon, Aquaculture and Seals Working Group, alongside Sainsbury's, Freedom Food, the RSPCA, the Sea Mammal Research Unit and International Animal Rescue.

“We appreciate that this has always been a difficult issue for us,” Alan Sutherland, managing director of Marine Harvest Scotland, said. “Animal welfare and conservation groups are keen to see an end to the shooting of problem seals and we are keen to find alternative ways to stop problem seals taking fish, damaging nets and releasing farmed salmon into the wild.”

The best solution is to focus on the common aim, rather than arguing about differences, said Sutherland.

Ally Dingwall, Aquaculture and Fisheries Manager at Sainsbury's said: “We welcome the formation of the group and the opportunity to support it through our Responsibly Sourced Salmon initiative. Ground breaking projects such as this are what our Responsibly Sourced Salmon is all about.”

Sainsbury's pledged action following a campaign by the Seal Protection Groups coalition - who [published the following leaflet](#) in 2008:



SAVE OUR SEALS!

Did you know an estimated 5,000 seals are shot by Scottish salmon interests each year?

At present, the UK's globally important populations of common and grey seals are 'protected' under the Conservation of Seals Act (1970).

But this outdated legislation does little more than provide a licence to kill them, except during their breeding seasons.

Even then, seals can be shot perfectly legally to prevent 'damage' to fish farm equipment or stock.



Above: Shot seal found near a Scottish salmon farm

We believe that salmon farmers can deter seals and other predators by using properly maintained, tensioned nets and other devices, without resorting to lethal methods. Unfortunately, all too often the bullet is seen as the cheaper option.

If you buy SCOTTISH SALMON, you are buying the BULLETS!

A coalition of concerned organisations have launched a campaign opposing the killing and maiming of seals by Scottish salmon producers. Sainsbury have just signed a major supply contract with Marine Harvest, a Norwegian owned company that has been regularly implicated in incidents involving the shooting of seals.

TRY SOMETHING NEW TODAY...

We believe dead and maimed seals are too high a price to pay for Scottish salmon. If you agree please don't buy any Scottish salmon product from Sainsbury's or any other retailer until they can guarantee that their Scottish salmon suppliers do not shoot seals. Thank you!

This leaflet was created on behalf of the Seal Protection Groups coalition and funded by:



www.protectourseals.org.uk

This led to a [joint press release](#) claiming that: "Salmon farmers, retailers and animal welfare groups are joining forces to bring to an end the killing of problem seals at salmon farms as quickly as possible":



marineharvest
excellence in seafood



Sainsbury's



NEWS RELEASE: 24th September 2010

New group aims to stop seal killing at fish farms

[Salmon farmers, retailers and animal welfare groups are joining forces to bring to an end the killing of problem seals at salmon farms as quickly as possible.](#)

In what is believed to be a world first, Marine Harvest, the world's largest salmon farmer will work with the Seal Protection Action Group as part of the newly formed "Salmon, Aquaculture and Seals Working Group", alongside Sainsbury's, Freedom Food, the RSPCA, the Sea Mammal Research Unit and International Animal Rescue.

A decade later Sainsbury's is still sourcing [salmon from Marine Harvest's seal-killing salmon farms](#).

RSPCA Assured [promote on their web-site](#) a recipe by Rosie Curtis of Marine Harvest (omitting to mention the fact that their supplier Marine Harvest still kills seals).

The screenshot shows the RSPCA Assured website interface. At the top, there is a navigation bar with the RSPCA logo and the text 'Dedicated to farm animal welfare'. Below this, the main heading is 'Baked salmon portions with cucumber, dill and yoghurt'. The page includes a description of the recipe, a list of ingredients, and a method section. The description mentions that the recipe was devised by Rosie Curtis, a producer of RSPCA Assured salmon for Marine Harvest. The ingredients list includes cucumber, sour cream, plain yoghurt, fresh dill, Fairtrade lemon juice, salt, white pepper, butter, and oil. The method section provides instructions for preheating the oven, draining the cucumber, and baking the salmon skin-side down.

Sainsbury's have long promoted Marine Harvest's 'Food Food' salmon (using celebrity chef Jamie Oliver in adverts):

SAINSBURY'S LAUNCH FREEDOM FOOD SALMON

Sainsbury's, who currently sell 27 per cent of all the salmon bought in the UK, has significantly increased its range of salmon sourced from Freedom Food approved farms, with the logo now on products in stores nationwide.

The range includes products from their value 'Basics' brand, right through to their premium 'Taste the

Difference' brand. Twelve thousand tonnes of Sainsbury's salmon is now being reared on farms inspected by Freedom Food to strict RSPCA welfare standards.

Justin King, Sainsbury's chief executive, says: "We sell the most salmon out of any retailer in the UK by some way, so focusing on this will make a significant difference. It will be market leading because it addresses

issues such as unsustainable feed and how the fish are reared. Plus it's regionally sourced and healthy. Many customers wanting all of this on a budget can buy our new 'Basics Sustainably Sourced Salmon' without having to worry about how the fish was sourced."

The salmon is sourced via Young's Seafood entirely from dedicated Scottish farms, owned by Freedom Food member, Marine Harvest Scotland.

Alan Sutherland, managing director of Marine Harvest Scotland, comments: "All the Marine Harvest Scotland sites that supply Sainsbury's have achieved Freedom Food certification and in just eight months. This is a tribute to both the standards already being achieved by the Marine Harvest farming teams and to their readiness and positive attitudes. It also reflects the constructive approach of the Freedom Food team."

Freedom Food estimates that nearly 50% of the Scottish salmon industry is now covered by the scheme, accounting for over 95 million fish.



Marine Harvest Scotland site



To coincide with the salmon launch, Jamie Oliver fronts a new Sainsbury's TV advertising campaign promoting Freedom Food labelled salmon. Premiered on 11 June, the ad will be featured in several peak time slots across a wide selection of TV channels including ITV, Channel 4, Five, ITV2 and E 4.

In 2005, Jamie Oliver was [asked to apologize after promoting Marine Harvest's polluted salmon farm in Loch Hourn in an advert for Sainsbury's](#) (read more via "[Campaigners want polluted salmon farm endorsed by Oliver to be shut](#)" and "[Fat Lady calls Naked Chef 'whore' over Sainsbury's salmon](#)").

In 2005, Marine Harvest was [shamed over the slaughter of seals in Loch Alsh](#) (a Special Area of Conservation). Watch a video report via "[Marine Harvest's Slaughter of Seals in Loch Alsh, Scotland](#)".

In 2008, [headless seal corpses](#) were washed up near Marine Harvest's salmon farm in Loch Alsh.

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Headless seals may have been shot

Two headless seal corpses have been discovered close to a salmon farm at Kyle of Lochalsh.

Animal welfare and wildlife tourism organisations are calling for the Scottish Government to end the killing of seals in Scottish waters.



It is thought the seals may have been decapitated to hide the fact they had been shot

The seals, one thought to have been a heavily pregnant female and the other a juvenile, were found last week by a wildlife tourism operator.

Local police have been made aware of the incident.

The bodies were found close to Sron Salmon farm, based in the Lochalsh Marine Area of Conservation.

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In 2015, [GAAIA wrote to retailers](#) including Sainsbury's urging an immediate ban on seal killing on salmon farms.

[7] A report - [RSPCA/Freedom Food & Seal Killing FOI Backgrounder](#) - published by GAAIA in May 2017 included:

"Data obtained from SNH ([Download SNH FOI 25 April 2017 document #7](#)) does at least name seven Freedom Food salmon farms - including Marine Harvest's Colonsay salmon farm

which did not use either Acoustic Deterrent Devices (ADDs) or APNs yet [shot one grey seal in 2016](#):

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

The report also included:

"The latest data ([published online by the Scottish Government](#)) on seals killed by salmon farms during 2016 reveals that at least 26 salmon farms killed seals but have not reported the use of Anti-Predator Nets (APN) in the last two licensing periods (encompassing 2015 and 2016 - as defined by [SNH FOI 25 April 2017 document #5](#) and [SNH FOI 25 April 2017 document #7](#)) casting doubt on the definition of "last resort" (i.e. salmon farmers are reaching for bullets before nets):

Bight of Bellister (Scottish Sea Farms)
 Cairidh (Marine Harvest)
 Camas Glas (Marine Harvest)
 Colonsay (Marine Harvest)
 Creag an t Sagairt (Marine Harvest)
 Eilean Grianain (Marine Harvest)
 Gometra (The Scottish Salmon Company)
 Greshornish (Marine Harvest)
 Hellisay (Marine Harvest)
 Holms Geo (Scottish Sea Farms)
 Isle Ewe (Marine Harvest)
 Kingairloch (Marine Harvest)
 Linnhe (Marine Harvest)
 Lochalsh (Marine Harvest)
 Loch Carnan (Marine Harvest)
 Maol Ban (Marine Harvest)
 Marulaig (Marine Harvest)
 Ornish (Marine Harvest)
 Shapinsay (Scottish Sea Farms)
 Slocka Ronas Voe (Scottish Sea Farms)
 Spelve A (Scottish Sea Farms)
 Sound of Harris (Loch Duart)
 Swarta Skerry (Balta Island Seafare)
 Taranaish (The Scottish Salmon Company)
 Vidlin North (Scottish Sea Farms)
 Winna Ness (Cooke Aquaculture)

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

Djubawick (Cooke Aquaculture)
Fuinary (Scottish Sea Farms)
Kishorn West (Scottish Sea Farms)
Stead of Aithness (Cooke Aquaculture)
Walters/East Lismore (Scottish Sea Farms)

- Note that all bar one (Balta Island Seafare's Swara Skerry site) of the 31 salmon farms listed above are accredited to the SSPO's Code of Good Practice (as member companies of the SSPO: [Cooke Aquaculture \(Scotland\)](#); [Loch Duart Ltd](#); [Marine Harvest \(Scotland\)](#); [The Scottish Salmon Company](#); and [Scottish Seafarms](#)) which claims that killing of seals "must only ever be as an act of last resort".

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

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

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

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