

Global Alliance Against Industrial Aquaculture, 8 May 2013

Lethal Scottish Farmed Salmon: Serial Seal-Killers Named & Shamed!

Scotland's seal killing salmon farms are finally [named and shamed](#) following a Freedom of Information disclosure forced on the Scottish Government by the Scottish Information Commissioner. The damning data reveals that over half of the salmon farms in Scotland killed seals as a 'last resort' even though only 13% of sites have predator nets installed!

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



FOI data [disclosed](#) late yesterday (7 May) reveals that salmon farms in Orkney & the North Coast, Shetland, Western Isles and on the West Coast of Scotland killed a total of 346 seals (93 common seals and 253 grey seals). During 2011 and the first six months of 2012, 112 different salmon farms killed at least one seal – representing 52% of the [215 active salmon farms](#) in Scotland. Fifteen salmon farms accounted for over a third (37%) of the killings – with the 'Seven Deadliest Salmon Farms' accounting for a quarter of all killings:

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

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

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

their products” (read the SSPO’s letter in full [online here](#)). In January 2013, the Scottish Information Commissioner [delayed disclosure](#) to investigate a [complaint](#) of death threats.

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

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

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



“Cheap and nasty Scottish farmed salmon leaves a bad taste in the mouth,” said Don Staniford of the [Global Alliance Against Industrial Aquaculture](#). “Scottish salmon farmers find it cheaper to buy bullets than install predator nets. Consumers have blood on their hands when buying lethally farmed Scottish salmon – even RSPCA-certified ‘Freedom Food’ salmon and ‘responsible’ salmon [certified](#) by the Aquaculture Stewardship Council and WWF. Thanks to the Scottish Information Commissioner the public, chefs and supermarkets can now choose to boycott trigger-happy salmon farms which kill seals.”

“When you buy Scottish salmon you pay for bullets to shoot seals,” said John Robins, Secretary to the [Save Our Seals Fund](#). “It is ludicrous and shameful that the Scottish Government is freely issuing licences to allow salmon farmers to kill seals when, by the Governments’ own admission, the vast majority of these floating factory fish farms do not

use proper anti-predator nets. When the Scottish Government and RSPCA Freedom Foods claim that seals are only shot as a 'last resort' they are lying. They are lying to the public and colluding with the salmon farmers in the killing of seals in Scottish waters. The Scottish Government and RSPCA Freedom Foods should insist that salmon farmers deploy and maintain proper seal exclusion nets.”



“The only truly ‘Scottish’ thing about the Norwegian-owned salmon farming industry operating in Scotland may be that the industry is too cheap to install predator nets,” continued Staniford. “These damning figures blow the industry’s claim that seals are only shot as a ‘last resort’ out of the water. The bloody truth is that 4 out of 5 salmon farms do not even have predator nets and are killing seals unnecessarily. Shame on the salmon farming industry and shame on supermarkets for buying farmed and dangerous Scottish salmon”



Following yesterday’s FOI reply the Scottish Government immediately posted new data on Scotland’s seal killers [online](#) (read 2012 seal killings [online here](#); read 2011 seal killings [online here](#)).

Today, GAAIA is writing [once again](#) to all supermarkets asking them to stop sourcing farmed salmon from all seal-killing salmon farms in Scotland. A letter will also be sent today (8 May) to the US Department of Commerce [repeating](#) the call to ban seal-unfriendly Scottish farmed salmon under the Marine Mammal Protection Act.

Read more background via “[Scottish Salmon’s Seal Killers Named & Shamed!](#)” and “[Victory for Freedom of Information - Seal Killers in Scotland Named & Shamed by 7 May!](#)”

More details via “[The Killing Farms](#)” and “[Killer Panda](#)”

Contacts:

Don Staniford (GAAIA): dstaniford@gaaia.org (email to arrange a phone call – currently in Canada)

John Robins (Save Our Seals Fund & Animal Concern): 01389 841111 and 07721 605521

Notes to Editors:

[1] Download the data online here for [2012](#) and [2011](#)

Here’s the FOI reply from the Scottish Government yesterday (5.31pm UK time).

Attached:  Letter to D Staniford.doc (468 KB);  Seal Returns 2011 - FoI Response.xls (43 KB);  Seal Returns 2012 - FoI Response.xls (36 KB)

From: Andrew.Kent@scotland.gsi.gov.uk [mailto:Andrew.Kent@scotland.gsi.gov.uk]
Sent: 07 May 2013 09:31
To: salmonfarmingkills@gmail.com
Subject: Decision 193/2012

Dear Mr Staniford,

Please find attached letter and excel spread sheets.

Regards

Andrew Kent
Marine Mammals Policy Officer

Marine Scotland
Rm. 1A South
Victoria Quay
EDINBURGH
EH6 6QQ

□

Your ref:
Our ref: FOI/12/00534

7 May 2013

Dear Mr Staniford

I refer to your original request of 3 April 2012 under the Freedom of Information (Scotland) Act 2002, the decision by the Scottish Information Commissioner of 26 November 2012 and the Commissioner's subsequent letter of 23 April 2013 announcing Enforcement of Decision 193/2012.

In compliance with the Commissioner's Decision 193/2012 and subsequent letter on its enforcement, I attach two tables, which set out the information that Marine Scotland holds on how many seals were killed by which fish farming companies at which sites during 2011 and the first half of 2012 respectively.

Please note that the Table for 2012 includes the complete figures for the second quarter for ease of reference.

In line with recommendations in the Decision, the information has been consolidated into the two tables for disclosure.

Yours sincerely

IAN WALKER
Marine Environment

Victoria Quay, Edinburgh EH6 6QQ
www.scotland.gov.uk/marinescotland

2012 Returns		Quarter 1		Quarter 2			
Licence No:	Licence Name:	Site	Common	Grey	Site	Common	Grey
DNC10/2012/w	Northern Isles Salmon Ltd	FS/0597			3 FS/0908		1
"	"	FS/0908			2 FS/1020		1
"	"	FS/0031			2		
"	"	FS/1080			1		
DNC11/2012/w	Scottish Sea Farms	FS/0860			5 FS/0359		1
"	"	FS/1023			4		
Orkney & North Coast Total					17		3
S01/2012/w	Meridian Salmon Group				FS/0074		2
S02/2012/w	Boundskerries Seafoods Ltd				FS/0310		1
S07/2012/w	Hjaltland Seafarms Ltd	FS/1009			3 FS/0140		2
"	"	FS/0333			3 FS/1039		1
"	"	FS/0501			2 FS/0333		1
"	"	FS/0140			3 FS/0715		1
"	"	FS/0946			3		
"	"	FS/0386			1		
S08/2012/w	Scottish Seafarms Ltd	FS/0033			1 FS/0699		1
"	"	FS/0699			1		
Shetland Total					17		9
W06/2012/w	Marine Harvest	FS/1033			1 FS/0502		1
"	"	FS/0502			1		
W08/2012/w	The Scottish Salmon Company	FS/0752			2 FS/0752		3
"	"	FS/0998			1 FS/0998		1
"	"	FS/0411			2		
W09/2012/w	The Scottish Salmon Company	FS/1118			1		
W10/2012/w	The Scottish Salmon Company	FS/0242			2		
W11/2012/w	Loch Quat Ltd	FS/0072		1	2		
"	"	FS0853		1	1		
Western Isles Total				2	13		5
SW08/2012/w	The Scottish Salmon Company	FS/0767		6			
"	"	FS/0818			2		
"	"	FS/0698			1		
"	"	FS/0851		2			
South West Total				8	3		
WS06/2012/w	Meridian Salmon Group (aka Lakeland Marine)	FS/0629		2			
"	"	FS/0464		1			
"	"	FS/0356			2		
WS07/2012/w	The Scottish Salmon Company	FS/1010			1		
"	"	FS0336			1		
WS11/2012/w	Dawnfresh Farming Ltd	FS/1112		1	Site no not provided		2
WS13/2012/w	Scottish Sea Farms	FS/0549			2		
"	"	FS/0694		1			
"	"	FS/0634		2			
"	"	FS/0253			1		
WS21/2012/w	Marine Harvest	FS/0602		3	3		
"	"	FS/0519			1		
WS22/2012/D	North and North West Salmon Management Group	Site no not pro		2	1 FS/0067		1
"	"				FS/0068		1
West Coast Total				12	12		3
SCOTLAND TOTAL				22	62		18

2011 Returns		Quarter 1	Common	Grey	Quarter 2	Common	Grey
Licence No:	Licence Name:	Site			Site		
ONC10/2011/W	Northern Isles Salmon Ltd	FS/0390		6			
"	"	FS/1209		4			
"	"	FS/0645		2			
ONC11/2011/W	Scottish Sea Farms	FS/0361		2			
"	"	FS/0359		1			
"	"	FS/1023		1			
Orkney and North Coast Total			0	16		0	0
S01/2011/W	Lakeland Unst Ltd - Hoga Ness Salmon Ltd - Northern Isles Salmon L	FS/0666		1			
S02/2011/W	Bound Skerries Seafood Ltd				FS/0439		1
"	"						
S05/2011/W	Balta Island Seafare Ltd				Site no not provided		2
S07/2011/W	Hjaitland Seafarms Ltd	FS/0937		1	FS/0515		1
"	"	FS/0433		1	FS/0333		3
"	"	FS/0447		1	FS/0764		4
"	"	FS/0378		2			
"	"	FS/0386		1			
"	"	FS/0140		4			
"	"	FS/0333		6			
"	"	FS/1045		1			
"	"						
"	"						
S08/2011/W	Scottish Sea Farms				FS/0033		2
"	"						
"	"						
Shetland Total			0	18		0	13
W/03/2011/W	The Scottish Salmon Company (prev West Minch Salmon)	FS/1013		3			
"	"	FS/0190		1			
W/04/2011/W	The Scottish Salmon Company (prev West Minch Salmon)						
W/06/2011/W	Marine Harvest (Lewis & Harris)	FS/1042		1			
W/08/2011/W	Scottish Salmon Company (Loch Roag)	FS/0998		2			
"	"						
"	"						
W/11/2011/W	Loch Duart Ltd						
"	"						
Western Isles Total			4	3		0	0
SW07/2011/W	Lakeland Marine Farm				FS/1176		1
SW08/2011/W	Scottish Salmon Company	FS/1019		1	FS/0423		1
"	"	FS/0851		2			
"	"	FS/0423		1			
"	"	FS/0530		1			
"	"	FS/0894		1			
South West Total			4	2		0	2
WS06/2011/W	Lakeland Marine Farm Ltd	FS/0464		1	FS/0629		4
"	"						
WS08/2011/W	Scottish Salmon Company (Loch Portree)						
"	"						
WS10/2011/W	North West Salmon Management Group				Site no not provided (Loch Duar		2
"	"						
WS11/2011/W	Dawnfresh Farming Ltd	FS/1067		1	FS/1101		1
"	"				FS/1112		1
WS13/2011/W	Scottish Sea Farms (Scotland Region)	FS/0427		1			
"	"	FS/0875		1			
"	"	FS/1047		2			
"	"	FS/0549		1			
WS18/2011/W	Scottish Salmon Company (Loch Torridon)						
WS19/2011/W	Scottish Salmon Company (Mull)	FS/0839		1	FS/0617		1
"	"	FS/0617		2			
WS21/2011/W	Marine Harvest combined	FS/0212		1	FS/0212		1
"	"	FS/0241		1	FS/0240		1
"	"	FS/0249		1	FS/0244		1
"	"	FS/0413		1			
"	"						
"	"						
"	"						
"	"						
West Scotland Total			11	8		7	5
SCOTLAND TOTAL			19	47		7	20

2011 Returns		Quarter 3		Quarter 4			
Licence No:	Licence Name:	Site	Common	Grey	Site	Common	Grey
QNC10/2011/w	Northern Isles Salmon Ltd	FS/1020			1 FS/0645		6
"	"				FS/0597		2
QNC11/2011/w	Scottish Sea Farms	FS/1023			2 FS/1023		4
"	"				FS/0860		9
Orkney and North Coast Total			0	3		0	21
S01/2011/w	Lakeland Unst Ltd - Hoganess Salmon Ltd - Northern Isles Salmon Ltd						
S02/2011/w	Bound Skerries Seafood Ltd	FS/0439			1 FS/0310		1
"	"	FS/0310			1		
S05/2011/w	Balta Island Seafare Ltd	FS/0717			3 FS/0717		1
S07/2011/w	Hjaitland Seafarms Ltd	FS/0292			1 FS/027		1
"	"	FS/1114			3 FS/0333	1	2
"	"	FS/0715			1 FS/039		2
"	"	FS/0386			1 FS/0501		1
"	"	FS/0377			1 FS/0140		1
"	"	FS/0140			2		
"	"	FS/0399			1		
"	"	FS/0333			2		
"	"	FS/0501			3		
"	"	FS/0378			1		
"	"	FS/0764			1		
S08/2011/w	Scottish Sea Farms	FS/0032			2 FS/0608	1	1
"	"	FS/0699			2 FS/0699		1
"	"	Site no not provided (Man)			1		
Shetland Total			0	27		2	11
W/03/2011/w	The Scottish Salmon Company (prev West Minch Salmon)				FS/1256	1	1
"	"						
W/04/2011/w	The Scottish Salmon Company (prev West Minch Salmon)	FS/0638	2		1		
W/06/2011/w	Marine Harvest (Lewis & Harris)	FS/0954			1		
W/08/2011/w	Scottish Salmon Company (Loch Roag)	FS/1103			2 FS/0927		6
"	"	FS/0411			3 FS/0752		2
"	"	FS/0752			6		
W/11/2011/w	Loch Duart Ltd	FS/0072	2		FS/0072	1	
"	"				Site no not pr	1	1
Western Isles Total			4	13		3	10
Sw07/2011/w	Lakeland Marine Farm						
Sw08/2011/w	Scottish Salmon Company	FS/1019	1		FS/0199	4	
"	"						
"	"						
South West Total			1	0		4	0
WS06/2011/w	Lakeland Marine Farm Ltd	FS/0629	3		FS/0356		4
"	"	FS/0464	2		FS/0629		1
WS08/2011/w	Scottish Salmon Company (Loch Portree)				FS/0708	1	
"	"				FS/0880		1
WS10/2011/w	North West Salmon Management Group	Site no not pro	1		Site no not pr	2	
"	"				FS/0057	1	
WS11/2011/w	Dawnfresh Farming Ltd	FS/0040	1		FS/0040	1	
"	"	FS/1101	1				
WS13/2011/w	Scottish Sea Farms (Scotland Region)	FS/0694	1		FS/0616	2	
"	"						
"	"						
WS18/2011/w	Scottish Salmon Company (Loch Torridon)				FS/0594		1
WS19/2011/w	Scottish Salmon Company (Mull)	FS/0593			1 FS/0839		1
"	"	FS/0617	1		FS/0617	1	
WS21/2011/w	Marine Harvest combined	FS/0413	3		4 FS/0249	1	1
"	"	FS/0252			1 FS/0413	1	
"	"	FS/0519			2 FS/0015	1	
"	"				FS/0247	1	1
"	"				FS/0605	1	
"	"				FS/0252	1	1
"	"				FS/0519	1	1
"	"				FS/0602		1
West Scotland Total			13	8		15	13
SCOTLAND TOTAL			18	51		24	55

To decipher the codes and find out which salmon farms kill seals you need to download the Scottish Government's '[Internet Based Register of Authorised Aquaculture Production Businesses and Processing Establishments](#)'. The 'Seven Deadliest Salmon Farms' (#s 333, 413, 629, 645, 752, 860 and 1023) are listed as follows:

Marine Harvest (Scotland) Ltd	Scottish Sea Farms Ltd	Scottish Sea Farms Ltd
Camas Glas	Shapinsay	Bring Head
Glenborrodale	Office 3 Terminal Building	Office 3 Terminal Building
Acharacle	Old Kirkwall Pier	Old Kirkwall Pier
Highland	Kirkwall Orkney	Kirkwall Orkney
PH36 4JP	KW15 1HU	KW15 1HU
Loch Sunart	Veantrow Bay Orkney	Bring Head Scapa Flow
FS0413	FS0860	FS1023
NM643590	HY501213	HY273022

The Scottish Salmon Company	Meridian Salmon Farms Ltd
Taranaish	Kirk Noust
East Loch Roag	Rousay
Breascleate Pier, Breascleate	Orkney
Isle of Lewis	
HS2 9DY	KW17 2PR
Loch Rog An Ear south of Aird Taranais Lewis Western Isles	Rousay Sound Rousay
FS0752	FS0645
NB177372	HY449291

Meridian Salmon Farms (Argyll) Ltd	Hjaltland Seafarms Ltd
Poll Na Gille	East Voe Laxfirth
Units 2&3	Wadbister Shore Base
Tigh Mhicleoid	Wadbister
Loch Nell St Lochgilphead	Girlsta, Shetland
PA31 8JL	ZE2 9SQ
Loch Melfort	in Lax Firth west of Houbie Shetland
FS0629	FS0333
NM774078	HU449482

[2] Read the SSPO's letter [online here](#)



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

December 6th 2012

Dear Willie

Information Commissioner Decision 193/2012

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

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

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

Could you please confirm that this is your intention?

Yours sincerely,

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

SCOTT LANDSBURGH
Chief Executive

Read SSPO's policy on predators [online here](#) including the SSPO briefing paper "[Seals & Salmon Farms: Not Always the Story of the Cute Cuddly Seal](#)" (December 2012)

The report above refers to a [RSPCA press release](#) (undated) on shooting seals – which includes: "The shooting of one seal is still one too many and the RSPCA and Freedom Food are working closely with the Salmon, Aquaculture and Seals Working Group (of which we were founder members) to try and find new ways to reduce the use of a lethal method of predator control to zero."

In 2008, The Guardian reported via “[RSPCA warns Scottish salmon farmers to shoot fewer seals](#)”: “Salmon farmers could be expelled from one of the UK's leading animal welfare schemes if they continue shooting seals in large numbers, after scientists warned that common seals are suffering a catastrophic decline. The RSPCA is to warn more than 80 fish farms that are members of its Freedom Foods welfare accreditation scheme that they must curb the practice or face losing their valuable membership of the scheme. The retailer Sainsbury's has also promised it will phase out suppliers associated with seal shooting after the Guardian revealed that common seal numbers fell by a quarter last year in some parts of the UK and by 50% over the past five years in others.”

Read more details on the SSPO's lethal shoot-to-kill policy via “[SSPO condemns freedom of information decision on seal killings](#)” (Fish Update, 26 April 2013)

[3] Information on salmon farms with and without predator nets was obtained in March & April 2013 via separate FOI requests – read the data detailing the 169 salmon farm sites in Scotland WITHOUT predator nets [online here](#); read the data detailing the 47 salmon farm sites in Scotland WITH predator nets [online here](#).

From: Ian.Walker@scotland.gsi.gov.uk [mailto:Ian.Walker@scotland.gsi.gov.uk]
Sent: 24 April 2013 00:08
To: salmonfarmingkills@gmail.com
Cc: Andrew.Kent@scotland.gsi.gov.uk; Morag.Campbell2@scotland.gsi.gov.uk
Subject: FOI/13/00464 - Fish Farms without Anti-predator Nets

Dear Mr Staniford

Thank you for your e-mail request of 22 March 2013 for information under the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 about seal licensing, as below.

As the information you have requested is 'environmental information' for the purposes of the Environmental Information (Scotland) Regulations 2004 (EIRs), we are required to deal with your request under those Regulations. We are therefore applying the exemption at section 39(2) of the Freedom of Information (Scotland) Act 2002 (FOISA), so that we do not also have to deal with your request under FOISA. As the exemption is conditional we have applied the 'public interest test'. This means we have, in all the circumstances of this case, considered if the public interest in disclosing the information under FOISA outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption, because there is no public interest in dealing with the same request under two different regimes. This is essentially a technical point and has no material effect on the outcome of your request.

You requested the names of the companies which operate the sites listed in a previous response dealing with salmon farms in Scotland without anti-predator nets.

This information is already publicly available on the Scottish Government web-site at the following link:-

<http://www.scotland.gov.uk/Topics/marine/science/Publications/publicationslatest/farmedfish/apbs>

If you check the individual site registration numbers against this list you can easily find out the name of the relevant operating company.

If you are unhappy with this response to your request, you may request that we undertake an internal review, by writing to Graeme Dickson, Director-General Enterprise, Environment and Digital, GW 10, St Andrews House, Edinburgh EH1 3DG. Your request should explain why you wish a review to be carried out, and should be made within 40 working days of receipt of this e-mail, and we will reply within 20 working days of receipt. If you are not happy with the result of the review, you then have the right to make a formal complaint to the Scottish Information Commissioner.

I hope this is helpful.

Ian Walker
Marine Scotland
Marine Planning & Policy
Area 1A-South
Victoria Quay
Edinburgh
EH6 6QQ
0131 244 6568
0131 244 7613
ian.walker@scotland.gsi.gov.uk

From: Don Staniford [<mailto:salmonfarmingkills@gmail.com>]
Sent: 22 March 2013 14:04
To: Walker IW (Ian)
Cc: Kent A (Andrew); Campbell M (Morag) (MARLAB)
Subject: RE: FoI/13/00282 Fish Farms without Anti-predator Nets

Ian,

Thanks for the information. Could you please list the companies who operate the 169 sites named?

Please consider this an official request for information under the appropriate FOI regulations if necessary.

Don

From: Ian.Walker@scotland.gsi.gov.uk [<mailto:Ian.Walker@scotland.gsi.gov.uk>]
Sent: 22 March 2013 02:57
To: salmonfarmingkills@gmail.com
Cc: Andrew.Kent@scotland.gsi.gov.uk; Morag.Campbell2@scotland.gsi.gov.uk
Subject: FoI/13/00282 Fish Farms without Anti-predator Nets

Dear Mr Staniford

Thank you for your e-mail request of 21 February 2013 for information under the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 about seal licensing, as below.

As the information you have requested is 'environmental information' for the purposes of the Environmental Information (Scotland) Regulations 2004 (EIRs), we are required to deal with your request under those Regulations. We are therefore applying the exemption at section 39(2) of the Freedom of Information (Scotland) Act 2002 (FOISA), so that we do not also have to deal with your request under FOISA. As the exemption is conditional we have applied the 'public interest test'. This means we have, in all the circumstances of this case, considered if the public interest in disclosing the information under FOISA outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption, because there is no public interest in dealing with the same request under two different regimes. This is essentially a technical point and has no material effect on the outcome of your request.

You requested the names of all salmon farms in Scotland without anti-predator nets.

Marine Scotland only has information on the presence/absence of anti-predator nets in respect of those fish farm sites, which are included in applications for seal licences. This information was extracted from a survey of sites requesting such licences and has been used to compile the attached list of individual fish farm sites (attached), which are either not using anti-predator nets or do not hold such nets in storage for use if and when seals become a problem. We have no information on those fish farm sites not involved in seeking a seal licence.

All fish farms, which have submitted applications for a seal licence, already employ at least one and many a range of non-lethal measures. The non-lethal measure that is generally considered to be most effective against seals is tensioned nets, which although actually designed to keep fish contained also help to keep seals out. Almost all fish farms seeking a seal licence have such nets installed. In addition to this, almost two thirds of fish farms seeking a seal licence use acoustic deterrents and seal blinds and a fifth use anti-predator nets. There are, however, a number of restrictions on the ability of fish farms to make use of some non-lethal measures, usually due to their potential impact on other marine species.

In this context, the issue with anti-predator nets is that they are indiscriminate. They have a tendency not simply to exclude but to entangle and drown a range of predators including seabirds, otters, seals, porpoises and dolphins. This usually involves a very slow and lingering death for the animals concerned. This is the reason that the Scottish Government, supported by Scottish Natural Heritage, does not insist on their use at all fish farms. The RSPCA endorsed this view in an article in the Press and Journal on 18 September 2012. This is the principal reason for the limited use of anti-predator nets at fish farms (only 20% of sites have such nets).

In addition to such significant concerns, there are also a range of different views on the relative effectiveness of various non-lethal measures, including anti-predator nets and none have, to date, entirely eliminated the risk of seal predation.

In these circumstances, it would not be appropriate for Marine Scotland to consider anti-predator nets as best practice in predator control that should be adopted across all fish farm sites. The widespread use of anti-predator nets elsewhere has had unfortunate consequences:-

<http://www.cbc.ca/news/canada/british-columbia/story/2007/04/20/bc-sea-lions.html>

In circumstances, where anti-predator nets either cannot be deployed because of the risk to other species or have already proved ineffective in excluding seals, it is, sadly, sometimes necessary to shoot seals as a last resort.

Marine Scotland is working closely with scientists and the industry to develop effective and practical new non-lethal measures to protect fish farms from seal predation.

If you are unhappy with this response to your request, you may request that we undertake an internal review, by writing to Graeme Dickson, Director-General Enterprise, Environment and Digital, GW 10, St Andrews House, Edinburgh EH1 3DG. Your request should explain why you wish a review to be carried out, and should be made within 40 working days of receipt of this e-mail, and we will reply within 20 working days of receipt. If you are not happy with the result of the review, you then have the right to make a formal complaint to the Scottish Information Commissioner.

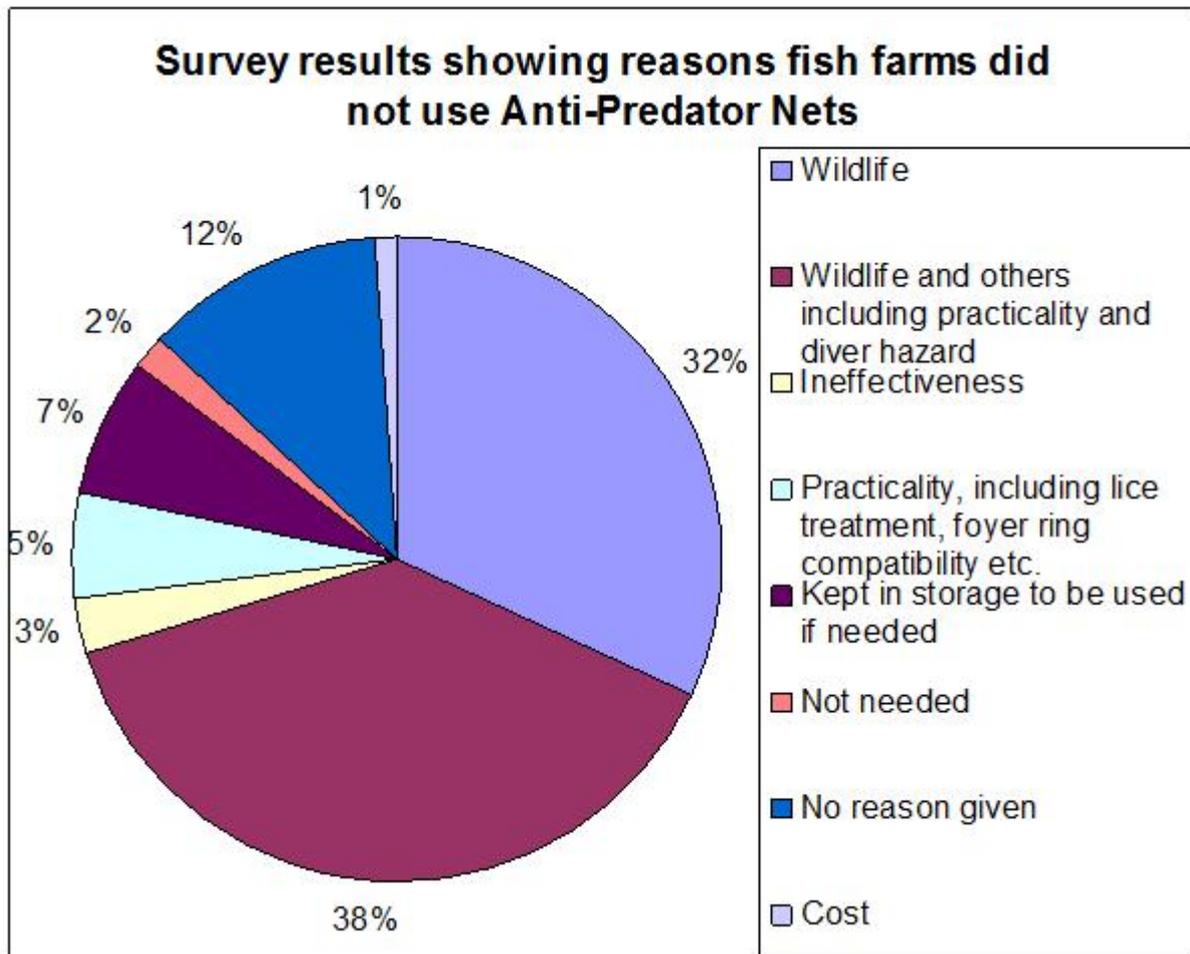
I hope this is helpful.

Read a letter detailing a Scottish Government survey on predator nets [online here](#) – including:

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 The Sunday Times article [“Fish Farms in Shooting Seals Row”](#) (16 September 2012)

[4] In June 2012 and in October 2011, GAAIA [wrote](#) to the U.S. Department of Commerce urging a boycott of Scottish farmed salmon via the Marine Mammal Protection Act.

[5] A poll conducted in 2009 revealed that the majority of people in the UK believe that supermarkets should refuse to buy farmed salmon from companies which kill seals:

58% believe that High Street retailers should not buy salmon from any suppliers that kill UK seals’ with only 15% disagreeing.

52% of people buying salmon products said they would be prepared to pay more for them to stop UK seals being killed, with only 17% disagreeing. 61% of women polled said they would be prepared to pay more.

“With the majority of people supporting a change in the law to protect seals and believing

that High Street retailers should not buy salmon from producers that shoot seals, the tide is turning against the routine killing of our seals” said Andy Ottaway of the Seal Protection Action Group, “Even in these harsh economic times over half of the salmon buying public said they would be prepared to pay more for salmon products to stop seals being killed”.

Read more via “[New poll shows UK public want salmon without seal killings](#)”

GAAIA wrote in June 2012 to retailers asking them if they sourced farmed salmon from farms where marine mammals have been killed. Read the letter in full [online here](#)

Read previous correspondence with the U.S. Government calling for a ban on imports of farmed salmon - [online here](#)

[6] Read more background on the companies named and shamed for killing seals [online here](#)

The serial seal killers include the Norwegian multinationals Marine Harvest (now also owners of Meridian following their takeover of Morpol), Grieg Seafood (owners of Hjaltdland), Leroy and Salmar (owners of Scottish Seafarms) as well as The Scottish Salmon Company (owned by a Swiss bank and registered on the Oslo stock exchange in Norway) and the Scottish-owned Loch Duart which supplied the Queen’s [diamond jubilee luncheon](#) with farmed salmon as well as the [royal wedding](#) of Prince William and Kate Middleton.

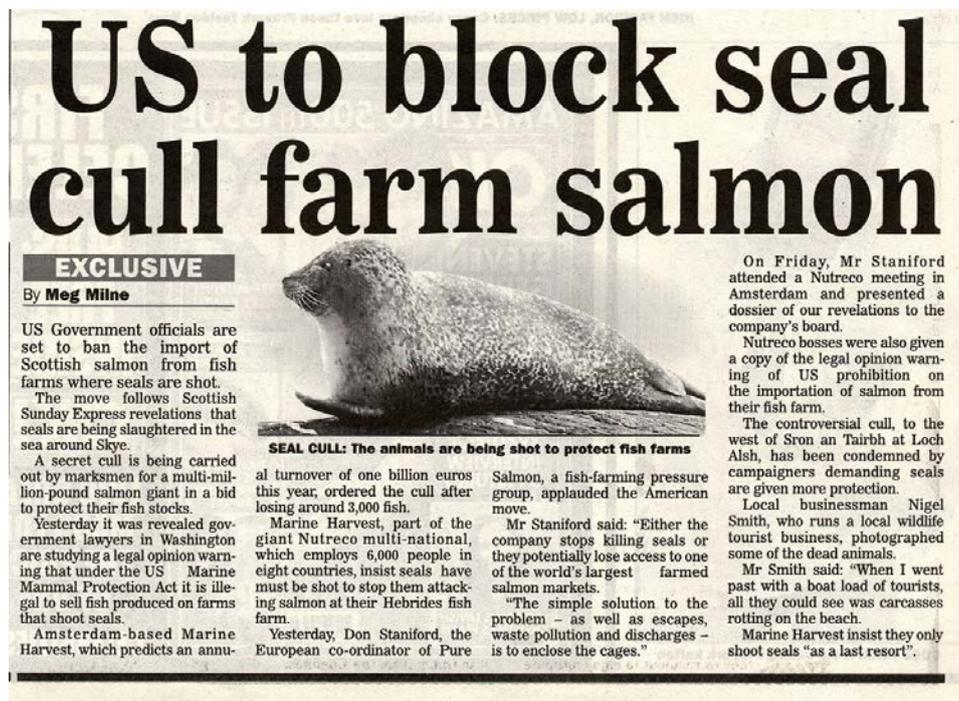
Marine Harvest:



[Marine Harvest](#), the world’s largest salmon farming company, is owned by Norway’s richest man John Fredriksen who is ranked 87th on the Forbes ‘[World’s Billionnaires](#)’ list with a fortune of \$11.5 billion. In 2005, following [the slaughter of seals in Loch Alsh](#) ‘Special of Area of Conservation’, Marine Harvest claimed that the slaughter of seals was “a last resort”.



However, local tourist operator Nigel Smith [testified](#) that “their strategy appears to be to shoot every seal that comes anywhere near their cages.” In 2005, the Pure Salmon Campaign secured a [legal opinion](#) on a potential ban for imports of Scottish farmed salmon to the United States leading to media coverage in the Sunday Express (December 2005) on the killing of seals in Loch Alsh by Marine Harvest:



In 2008, further evidence of killing of seals by [Marine Harvest Scotland](#) was [published](#) when two headless seals (including a pregnant female) were washed up near their farm in Loch Alsh. The deaths led to a call for the RSCPA to remove the ‘Freedom Food’ from seal-killing salmon farms.

“It makes me extremely angry that, while we are trying to get consumers to stop buying salmon from Marine Harvest and the other factory fish farmers who are shooting seals, the RSPCA are promoting the stuff,” [said](#) John Robins of Animal Concern. “What are they going to do next? Put Freedom Food labels on Japanese whale meat or sell T-shirts made of Canadian seal fur?”

In 2010, Marine Harvest Scotland [claimed](#) to be working with retailer Sainsbury’s and the Seal Protection Action Group, the RSPCA, the Sea Mammal Research Unit and International Animal Rescue “to stop seal killing at fish farms.”



Sainsbury's



In 2011, following a spate of marine mammal mortalities in British Columbia, [Marine Harvest Canada](#) invested in additional protector netting. According to [official statistics](#), Marine Harvest Canada saw “[higher than normal](#)” killings of seals and sea lions, with 124 seals and/or sea lions killed in the first quarter and 92 in the second quarter, representing more than a two-fold increase over the same period in 2010 and a four-fold increase over 2009.

Read more via “[Marine Harmfest](#)”, “[Who’s Calling Who a Convicted Criminal?](#)” and “[Mmm Mega-Marine Harvest: Super-Liced Salmon!](#)”.

Hjaltland:



HJALTLAND

[Hjaltland](#) is owned by the Norwegian multinational [Grieg Seafood](#). Hjaltland is [accredited](#) by the Soil Association as producing “organic” farmed salmon and certified under the RSPCA’s ‘Freedom Food’ scheme according to the “highest levels of animal welfare and responsible farming.”

In January, Grieg Seafood was charged under the Fisheries Act in Canada with nine counts of drowning sea lions or seals at its fish farms in 2009 and 2010 – including the “[accidental drowning](#)” of 52 California sea lions and one Harbour seal. [Court documents](#) stated that the company “did unlawfully destroy marine animals ... by drowning.” In June, Grieg officials pled not guilty at an [arraignment hearing](#) in Campbell River.

Earlier this month, yet another seal died at a Grieg salmon farm in British Columbia. “Once again, it’s another example of the failure of open net pen salmon farms to deal with their

problems,” [said](#) Will Soltau of the Living Oceans Society. “It’s a continuing problem. They don’t seem to be able to address it and marine mammals are paying the price.”

Read more via “[Fish farm operator charged over dozens of seal, sea lion deaths](#)”

Scottish Salmon Company:



The [Scottish Salmon Company](#) is the [parent company](#) of [Lighthouse Caledonia](#) which is listed on the [Oslo stock exchange](#) in Norway. [Shareholders](#) include Swiss and Norwegian banks. In 2010, the Scottish Salmon Company [acquired](#) West Minch Salmon which was marketed as [Hebrides Harvest](#). Hebrides Harvest claim on their [web-site](#) under ‘best practice’: “Predator Control: With the variety of predatory species that may occur around fish farms it is important to consider the siting of a fish farm in relation to known concentrations of predators. This process is now accommodated formally within the Environmental Impact Assessment process that is required for all new sites. Good husbandry and housekeeping practices will reduce the chances of attracting predators.”

In 2008, Lighthouse Caledonia was named as one of “[Scotland 25 Worst Pollution Performers](#)”. BBC News [reported](#) (November 2008) that Lighthouse Caledonia was fined £12,000 for a pollution incident in Loch Kishorn which caused [diesel contamination](#). In 2011, an outbreak of Amoebic Gill Disease led to “dozens of industrial skips full of dead fish” being taken away from a Scottish Salmon Company farm on the Isle of Arran (read more via “[Diseased Farmed Salmon Cause Stink in Scotland](#)”).

In 2013, the Sunday Herald [reported](#) on leaked emails from the Scottish Salmon Company referring to the Outer Hebrides as a ‘Viper’s Nest’.

Read more via “[Whistleblower at Scottish Salmon: the company who kicked the viper’s nest](#)”

Scottish Sea Farms:



[Scottish Sea Farms](#) is [owned](#) by the Norwegian companies [Salmar](#) and [Leroy](#). Scottish Sea Farms is [accredited](#) by the RSPCA to produce ‘Freedom Food’ farmed salmon.

“I honestly believe that Scottish Sea Farms, the company involved in the slaughter and based at South Shian by Oban, engaged in what can only be described as a mass slaughter of seals,” [wrote](#) Mark Carter, chairman of the Hebridean Partnership, in 2006. “I estimate that the total number of seals shot in and around the Lismore SAC to be in excess of sixty.”

Mark Carter [reported](#) in 2009: “John Barrington of Scottish Sea Farms gave a fairly sincere sounding reply that the industry only shoots seals as an ‘absolute last resort’. Unfortunately this is not true. To enable the ‘last resort’ feature within the pending Marine (Scotland) Bill, all possible measures should be in place before shooting becomes an option. Scottish Sea Farms do not employ the use of anti-predator nets, not even in the Lismore Special Area of Conservation for seals (pictured above), neither are they requested to do so by Scottish Natural Heritage or the Scottish Government.”

In 2011, the Hebridean Partnership [filed a complaint](#) with the European Commission relating to the killing of seals by Scottish Sea Farms in the Lismore ‘Special Area of Conservation’. In 2012, BBC News [reported](#) that Scottish Sea Farms were fined £333,335 (reduced from [£600,000](#)) following the death of two salmon farm workers. The Sunday Herald also [reported](#) in 2012 that the processing plant operated by Scottish Sea Farms was warned over safety by the U.S. Food & Drug Administration.

Loch Duart:



[Loch Duart](#) claims on their [web-site](#) to be “the first salmon farm in the world to have achieved formal recognition of its fish welfare and environmental policies.” Loch Duart [claims](#) to be “the first producer of Freedom Food salmon” proudly displaying the RSPCA’s logo on their [web-site](#).

Loch Duart recently supplied the Queen’s [diamond jubilee luncheon](#) with farmed salmon as well as last year’s [royal wedding](#) of Prince William and Kate Middleton. However, Loch Duart has a shoot to kill seal policy.



In June, a seal was [blamed](#) for the escape of 2,000 farmed salmon from Loch Duart's site at Torgawn. In 2009, Loch Duart also [blamed](#) seals for their appalling record on escapes.

"I avoid the Scottish and Irish industries because of their greenwashed, boutique-farm marketing schemes, their misleading regulations ([organic salmon?](#) From a net pen?), and their farmers' thuggish habit of [blowing seals' brains out when they come anywhere near the salmon pens,](#)" [wrote](#) Greenpeace's Casson Trenor in 2009.

Read more on Loch Duart's use of toxic chemicals via "[Loch Duart - the Toxic Salmon Company](#)"

Read more on Loch Duart's problems with infectious diseases via "[Fit for the Queen & Residents of Nova Scotia - Loch Duart's Chlamydia-Contaminated Salmon?](#)"

Meridian:



The [Meridian Salmon Group](#) was formed at the beginning of 2011 by the integration of two well established major farming companies, [Northern Isles Salmon](#) (formerly Mainstream Scotland) and The Lakeland Group. [Meridian Salmon](#) also includes Westray Salmon and Rysa Salmon. All four companies had been acquired in 2010 by the Polish-owned company [Morpol](#).

Shetland News [reported](#) in February: "Seven Shetland salmon farms have been granted licences to shoot 115 seals in 2012. The companies include Meridian Salmon Group, two of whose managers are due to appear in court later this year to face charges of unlawfully killing seals at its site in Hoganess, near Walls."



Shetland News [reported](#) in August 2011: “SSPCA officers raided Hoganess Salmon, near Walls, on Shetland’s west side after reports that seals had been killed illegally. They were supported by the local police and staff from Scottish Natural Heritage.”

In December 2012, Marine Harvest launched a [takeover](#) of Morpol which [continues](#) during 2013. The takeover is still [subject to approval](#) from the competition authorities.