

[Global Alliance Against Industrial Aquaculture](#), 23 September 2016

**The Two Billion Dollar Salmon Ban  
- Scotland, Canada, Chile, Faroe Islands, Norway & New Zealand in Firing Line**



New U.S. rules protecting marine mammals could cost trigger-happy salmon farmers around the world a staggering \$2 billion in lost export markets for farmed salmon!

In emails to the [Global Alliance Against Industrial Aquaculture](#), the U.S. Government has confirmed that salmon farms in Maine and Washington do NOT kill marine mammals [1] - in stark contrast to lethal salmon farms in [Scotland](#), [Canada](#), [Chile](#), [Faroe Islands](#), [New Zealand](#) and [Australia](#) (with question marks hanging over Norway and Ireland).

In order to comply with U.S. standards (i.e. zero marine mammals killed), farmed salmon sourced from salmon farms which kills seals, sea lions, dolphins and even whales will be banned from the lucrative U.S. market by 1 January 2022 (when the [Fish and Fish Product Import Provisions of the Marine Mammal Protection Act](#) is enforced).

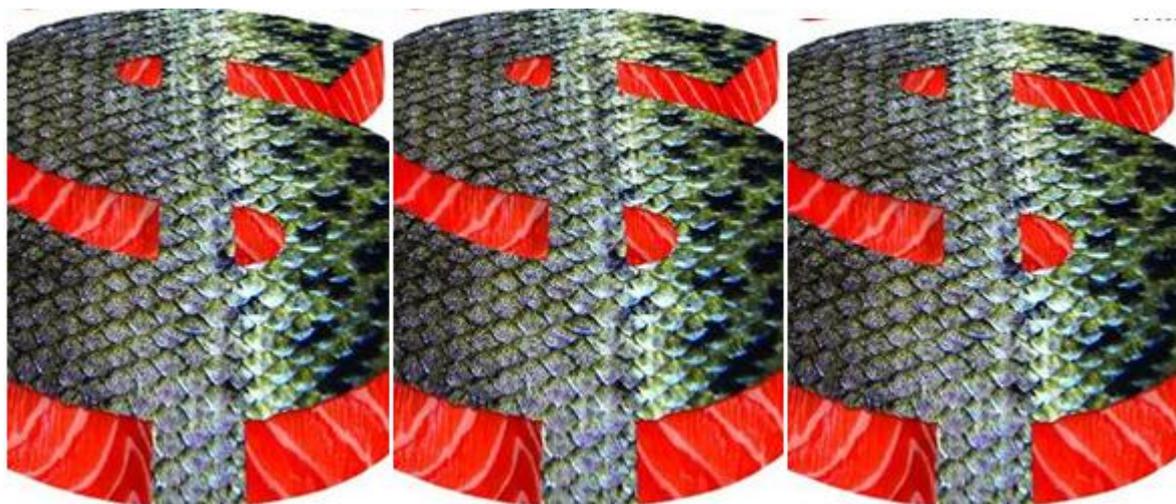
"Salmon farmers around the world are caught in the cross-hairs of the new U.S. import rules and have a \$2 billion bullet pointed at their head," said Don Staniford, Director of the [Global Alliance Against Industrial Aquaculture](#). "A '[comparability finding](#)' with the U.S. salmon farming industry effectively means zero seals, sea lions or other marine mammals killed. In view of the damning data from Scotland and Canada there is currently zero chance of Scottish or Canadian farmed salmon being allowed into the U.S. market with black marks hanging over farmed salmon from Chile, New Zealand, Australia, the Faroe Islands, Ireland and Norway."

"Salmon farmers could get to zero in a flash," continued Staniford. "Simply stop shooting and start installing predator nets as they use in the United States. Until salmon farmers bite the bullet and stop slaughtering marine mammals consumers should boycott cheap and nasty farmed salmon. Supermarkets should not wait for the U.S. rules to hit in 2022 - they should force salmon farmers to introduce a cease-fire immediately. A zero tolerance for cruelty to marine mammals means a zero tolerance for farmed salmon!"

[According to the USDA](#), the value of U.S. imports of Atlantic salmon in 2015 was over \$2 billion - with Chile exporting 284,643 tonnes worth \$1.1 billion; Canada exporting 177,550 tonnes worth \$504 million; Norway exporting 82,114 tonnes worth \$330 million; the U.K. exporting 27,232 tonnes worth \$96 million and the Faroe Islands exporting 27,215 tonnes worth \$84 million (download data in full via [Aquaculture Trade - Recent years and top countries](#)).

U.S. Atlantic salmon imports, value by selected sources (1,000 U.S. dollars)						
Product, country code and name	2010	2011	2012	2013	2014	2015
Total 3370 Chile	292,885	563,398	748,492	1,080,522	1,332,377	1,097,282
1220 Canada	495,073	478,325	503,259	472,752	354,786	504,343
4039 Norway	399,592	222,054	137,535	201,523	295,726	330,471
4120 United Kingdom	112,849	113,566	88,916	109,640	133,491	96,126
4091 Faroe Islands	66,781	97,208	67,429	120,283	127,219	84,249
5700 China (Mainland)	32,249	27,629	40,902	58,016	54,409	5,447
4280 Germany, Fed.					20,894	39,866
Other countries	39,502	18,031	19,555	32,701	38,244	20,543
<b>Total</b>	<b>1,438,931</b>	<b>1,520,211</b>	<b>1,606,088</b>	<b>2,075,437</b>	<b>2,357,146</b>	<b>2,178,328</b>

[According to the USDA](#) during 2015, Ireland exported \$2.5 million worth of Atlantic salmon with New Zealand exporting \$3.5 million (Australia exported Atlantic salmon worth only \$2,000). Germany (which does not farm salmon but processes farmed salmon from Norway) exported Atlantic salmon worth \$40 million; Iceland exported \$12 million and China exported \$5.4 million (download data in full via [Aquaculture Trade - All years and all countries](#)).



The new U.S. rule [published](#) last month [explicitly states](#) that salmon farms must stop killing marine mammals in order to export to the United States. Importing countries will have a [five-year interim exemption period](#) (starting on 1 January 2017) to implement a regulatory program that "[prohibits the intentional killing or serious injury of marine mammals in all](#)

[fisheries](#)" and "[must demonstrate they have a regulatory program for reducing marine mammal incidental mortality and serious injury that is comparable in effectiveness to U.S. standards](#)" [2].

"The regulatory definition of a commercial fishing operation includes aquaculture, and National Marine Fisheries Service will classify foreign aquaculture operations considering both intentional and incidental mortality and serious injury according to the requirements of this rule," [stated the U.S. Federal Register](#) on 15 August 2016. "When making comparability finding determinations for farmed salmon imports, the National Marine Fisheries Service will evaluate measures to reduce interactions, prohibit intentional, and reduce incidental mortality and serious injury of marine mammals in foreign aquaculture operations as compared to the U.S. standards for aquaculture facilities (*e.g.*, use of predator nets and the prohibition on intentional killing)."

In view of the confirmation by the U.S. Government that zero marine mammals are killed on salmon farms in the United States [1], nations killing marine mammals will be denied a "comparability finding". "Fish and fish products from fisheries that fail to receive a comparability finding may not be imported into the United States," stated [the U.S. Federal Register](#). "If the Assistant Administrator denies or terminates a comparability finding for a fishery, the Assistant Administrator, in cooperation with the Secretaries of the Treasury and Homeland Security, will identify and prohibit the importation of fish and fish products into the United States from the harvesting nation caught or harvested in that fishery."

The Sunday Herald in Scotland [reported](#) (11 September 2016):

A new legislative rule agreed by the US National Oceanic and Atmospheric Administration (NOAA) last month will prohibit the import of any fish that doesn't meet US standards. It is illegal to intentionally kill or injure seals in any commercial US fishing operation.

"This rule requires harvesting nations to demonstrate that they prohibit the intentional mortality or serious injury of marine mammals in the course of commercial fishing operations," said John Henderschedt, director of NOAA Fisheries Office of International Affairs and Seafood Inspection.

Countries must have "procedures to reliably certify that exports of fish and fish products to the United States are not associated with a fishery in which intentional killing or serious injury of a marine mammal is allowed," he added. "The rule establishes a five-year exemption period to allow foreign harvesting nations time to develop, as appropriate, regulatory programs comparable in effectiveness to US programs. NOAA does not prejudge any nation's or fisheries' current measures or ability to comply to this rule."

Read more via "[Scottish salmon exports at risk if seals keep being shot](#)"

Credit must go to animal welfare and environmental groups who have been pushing for a U.S. ban for over a decade. The Federal Register's [Fish and Fish Product Import Provisions of the Marine Mammal Protection Act](#) (15 August 2016) states under '[Petition to Ban Imports](#)':

Additionally, on October 5, 2011, and on March 13, 2012, NMFS received correspondence from 21 animal rights and animal welfare organizations and Save Our Seals Fund, respectively, urging it to take action to ban the importation of Canadian and Scottish aquaculture farmed salmon into the United States due to the intentional killing of seals asserting such lethal deterrence is subject to the importation ban under the MMPA sections 101(a)(2) and 102(c)(3) for international fisheries. NMFS decided that the proposed rule would be broader in scope than the 2008 petition. In particular, NMFS decided that it would be not limited in application to swordfish fisheries and would cover intentional, as well as incidental, killing and serious injury of marine mammals.

Read correspondence with the U.S. Department of Commerce since 2011 [online here](#) and read more background via [6].

**Contact:**

Don Staniford: [dstaniford@gaaia.org](mailto:dstaniford@gaaia.org) (email to arrange a phone call)

**Media Coverage:**

["Concern as crucial forum for protection of seals abandoned"](#)

["Scottish salmon exports at risk if seals keep being shot"](#)

["Stop the slaughter now"/"Cruelty and pollution have no place in Scotland's waters"](#)

["Sunday Herald: "Scotland's 'trigger-happy' salmon farmers risk losing £200m US export market"](#)

["Seal of Approval for U.S. Ban on Salmon"](#)

["Scottish Sea Farms points to progress in seal management"](#)

["Exposed: the inhumane shooting of hundreds of seals"](#)

["Scottish salmon has five years to cut seal deaths before NOAA action"](#)

["Five-Year Stay of Execution for Scottish Salmon's Serial Seal Killers - U.S. outlaws killing of marine mammals by 2022"](#)

["Campaigners claim new NOAA rules could see Scottish salmon banned from US"](#)

["End the slaughter of seals in Scotland now"](#)

["U.S. ban for lethal Scottish salmon- £200 million in exports killed off by seal slaughter"](#)

["Charity makes plea to end seal shooting in Scotland"](#)

["Closing the Net On 'Seal-Friendly' Scottish Salmon"](#)

["Scottish Salmon Blinded by Seal Killing"](#)

["Stop Shooting Seals for Salmon Meals"](#)

["Cecil the Seal Killers Named & Shamed in Scotland - Call for Boycott of "Seal Unfriendly" Scottish Salmon"](#)

["VICTORY: Disclosure of Seal-Killing Salmon Farm Data Ordered by 21 August"](#)

["Scottish Salmon's Secret Seal Killers! - FOI refusal prompts call for boycott of farmed salmon"](#)

["Lethal Scottish Farmed Salmon: Serial Seal Killers Named & Shamed!"](#)

["Scottish Salmon's Seal Killers Named & Shamed!"](#)

## The Global Background:

Scottish salmon - the [UK's #1 food export](#) - now risks being banned from the [£200 million per year U.S. market](#) over Scotland's [ongoing seal slaughter](#) which [exceeds 1,500 dead seals since 2011](#).

A [Parliamentary Question filed by Mark Ruskell MSP](#) earlier this month asked the Scottish Government "whether in order to preserve access to the US market for fish and fish products, whether it will introduce legislation that prohibits the intentional killing of marine mammals in all of Scotland's fisheries".

"There is already legislation in place to prevent deliberate killing of marine mammals, except under controlled circumstances," [replied](#) Roseanna Cunningham, Cabinet Secretary for Environment, Climate Change and Land Reform (15 September 2016). "This is delivered by the Marine (Scotland) Act 2010 for seals, and The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) for cetaceans".

The Glasgow Evening Times [reported](#) (18 September 2016):

Ruskell asked the Government whether the Scottish salmon-farming industry was compliant with a new US animal welfare regulation.

The regulation says "the harvesting nation must demonstrate it has prohibited the intentional mortality or serious injury of marine mammals in the course of commercial fishing operations".

Rural Economy Minister Fergus Ewing replied by stressing that compliance with import regulations in another country was a matter for exporting companies.

"The seal licensing system in Scotland enables fish farms to control seal predation as a means of last resort."

Exports of Canadian farmed salmon are also threatened. According to [Canadian Aquaculture](#), more than 85% of Canadian aquaculture production is exported – the largest export market is the United States: "The United States is Canada's major export market for farmed salmon - accounting for 93% of Canada's farmed salmon exports in 2006. In 2006, the US imported 78,733 tonnes of Canadian farmed salmon worth \$505 million."

The Department of Fisheries & Oceans told GAAIA (13 September 2016) that "there is a review underway to examine whether Canadian fisheries are in compliance with recently amended US marine mammal legislation" [3].

However, whilst data is available for [British Columbia](#) there is no data publicly available for Eastern Canada (GAAIA is still waiting for a formal reply from DFO).

[DFO statistics](#) show that since 1990, the salmon farming industry in British Columbia has killed more than 7,000 marine mammals: almost 6,000 harbour seals, 1,200 California sea lions and 363 endangered Steller sea lions (read more via "[Seals And Sea Lions Pay The](#)

[Price For B.C. Salmon Farming](#)" and "[California rescues sea lions while Canadian salmon farmers slaughter them](#)").

Official figures [published by the Canadian Government](#) for Q4 2015 (October-December) reveal that 15 sea lions and 2 seals were intentionally killed at just two salmon farms in British Columbia:

 <b>AQUACULTURE MANAGEMENT</b> Ensuring Sustainable Fisheries						
<b>Authorized Marine Mammal Control Activities</b> October-December, 2015						
Facility Reference Number	Licence Holder	Site Common Name	DFO Pacific Fishery Management Area	Marine Mammal Species		
				Harbour Seal	California Sea Lion	*Other
1148	Cermaq	Binns	24		15	
728	Cermaq	Sir Edmund Bay	12	2		
<b>Total:</b>				<b>2</b>	<b>15</b>	<b>0</b>

DFO [report](#) the "accidental" death of three sea lions and one seal during the first quarter of 2016 in British Columbia:

 <b>AQUACULTURE MANAGEMENT</b> Ensuring Sustainable Fisheries							
<b>MARINE MAMMAL ACCIDENTAL DROWNINGS</b>							
2016							
Quarter	Facility Reference Number	Licence Holder	Site Common Name	DFO Pacific Fishery Management Area	Marine Mammal Species		
					Harbour Seal	California Sea Lion	Other
Q1	1705	Grieg Seafood	Williamson Pass	25	1		
Q1	1288	Marine Harvest	Doyle Island	12		2	
Q1	1507	Cermaq	Millar Channel	24		1	

Whales have also suffered at the hands of salmon farms - with a humpback whale caught in a Marine Harvest salmon farm in British Columbia just this month (watch footage via "[Video: Humpback rescued from fish farm ropes by fisheries officials](#)"). In 2013, a humpback whale died in a salmon farm in the Clayoquot Sound UNESCO Biosphere Reserve (read more via "[Humpback whale corpse in fish farm raises questions](#)"). And in Scotland in 2014 a humpback whale drowned after becoming entangled in a salmon farm off the Isle of Mull (read more via "[Humpback Whale died after swimming into fish farm](#)").

GAAIA is currently gathering evidence of the killing of marine mammals at salmon farms around the world. Whilst some jurisdictions publish data online (e.g. [Scotland](#) and [British](#)

[Columbia](#)), others do not (e.g. Chile, Norway, Ireland, Australia, New Zealand, Eastern Canada).

In the absence of official Government statistics, the public is reliant upon media reports and other sources. For example, in the Faroe Islands, "around 100 seals are slaughtered each year by the salmon farming sector" [said Bjarni Mikkelsen at the Faroese Museum of Natural History in 2015](#). Bjarni Mikkelsen told GAAIA (24 September 2016): "No official data. But we want to monitor this, and have asked farming licence holders to deliver data on an annual basis."

In Australia, a news article this month reported that two seals were killed by salmon farms with one seal "[choked to death on its own vomit](#)". Environment Tasmania [report](#) that: "As of June 2013, at least 144 protected seals have died as a result of fish farming in just four years". The Tasmanian Times [reported](#) in July 2015: "the Tasmanian Government seal management strategy has resulted in normally protected seals being deliberately killed with Government approval".

The Australian [reported](#) in 2013: "Official figures show 452 seal relocations -- from fish farms to beaches hundreds of kilometres away -- in the past three years, sometimes resulting in deaths in transit. As well, the use of seal deterrents -- bean-filled bullets fired from a 12-gauge shotgun and explosive charges, known as crackers -- has become at times a daily occurrence. Use of these "deterrents" also appears to have become excessive, with multiple cases of between 140 and 215 explosive crackers used at a single farm in a single day. The Weekend Australian has witnessed the dumping of seals, killed at fish farms or during relocation, at suburban Hobart rubbish tips" (read more via "[Tasmania's salmon trade casts deadly net](#)").

In 2015, a Government submission to a Senate Inquiry in Tasmania [showed](#) that since 1990 (when the practise of seal relocation began) "a minimum of 5472 seal relocations had happened, at a cost to taxpayers estimated at about \$780 per relocation and the rest paid by fish farms" (read more via "[Seals blamed for fish business dive](#)").

In New Zealand, dolphins and seals have been reported killed in salmon farms in the Marlborough Sounds (read more via "[Dolphins die on NZ King Salmon farms](#)"). In 2011, The Marlborough Express [reported](#) that a salmon farmer "admitted charges of possessing an offensive weapon, a galvanised steel pole, in a public place at Ohau Point, and wilfully ill-treating 23 seals by clubbing them to death".

In Chile, a photo of salmon farmers killing a sea lion attracted the [condemnation of both the Chilean Government and salmon farming industry](#) itself in July 2015. The Chilean Government agency Sernapesca filed a formal complaint for animal abuse following the identification of the salmon farming company responsible (read more via "[Sernapesca files formal complaint over salmon farm workers' animal abuse](#)").

Intrafish [reported](#):



## Sernapesca files abuse complaint over salmon farm cruelty

Twitter photos show salmon farming center capture, assault and kill animal.

by IntraFish Media

July 17th, 2015 13:02 GMT Updated May 9th, 2016 18:38 GMT

Share: [Facebook](#) [Twitter](#) [LinkedIn](#) [Print](#) [E-mail](#)

Social media spurred the Chilean National Fisheries and Aquaculture Service (Sernapesca) to file a formal complaint against animal abuse on Wednesday.

Citizens posted photos on Tuesday to Sernapesca's Twitter account of employees of a salmon farming center capturing and assaulting to death an adult male sea lion.

"The salmon industry is constantly eliminating sea lions," said Ecoceanos director Juan Carlos Cárdenas in an article in [The Santiago Times](#) in 2012. "It's illegal, but they do it habitually. [Industry] divers have told us that the sea lions that break into salmon farms are shot and later removed. Also, when producers set up a salmon farm near a sea lion community, they sometimes go there during breeding season and kill all the babies and males. Or they splash the rocks with oil and burn the area. We've been reporting these kinds of practices since 2004."

Data on marine mammal mortalities at salmon farms has been requested from the Norwegian Government [4] and Irish Government [5]. In Ireland, evidence of over 100 seal mortalities has been gathered by the Irish Seal Sanctuary and published online via the '[Dead Seal Database](#)'.

## Notes to Editors:

[1] Here's correspondence with the U.S. Government confirming zero marine mammal mortalities at salmon farms in Maine and Washington:

**From:** Kevin Madley - NOAA Federal [mailto:[kevin.madley@noaa.gov](mailto:kevin.madley@noaa.gov)]

**Sent:** 20 September 2016 18:03

**To:** Don Staniford

**Subject:** Re: Data on marine mammal mortalities at salmon farms in Washington?

Hi Don,

Yes, no recorded marine mammal takes in Maine either. Predator nets are required and "takes" under the MMPA have not been granted.

Sorry for the delay but thanks for checking on confirmation.

### **Kevin Madley**

Regional Aquaculture Coordinator  
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**From:** Laura Hoberecht - NOAA Federal [mailto:[laura.hoberecht@noaa.gov](mailto:laura.hoberecht@noaa.gov)]

**Sent:** 09 September 2016 19:50

**To:** Don Staniford

**Subject:** Re: Data on marine mammal mortalities at salmon farms in Washington?

Hi Don,

You are correct, the current numbers for Washington salmon net pens are all zeros. There are reports of some marine mammal (California [sea lion](#)) bycatch in salmon net pens in the mid-90's when the industry was using predator exclusion nets anchored to the bottom. They have since changed their practices which has **\*\*eliminated\*\*** bycatch. They still use predator exclusion nets, just have changed the way they deploy them using a tension system to avoid bycatch. You can view the old numbers in the "US Pacific Marine Mammal Stock Assessments" available online:

<http://www.nmfs.noaa.gov/pr/sars/region.htm>

See Table 1 in these reports for [sea lions](#) (i.e. see 2001 report with numbers for mid-90's, no numbers since then).

Besides predator exclusion nets, the commercial net pen industry in WA does not use any other marine mammal deterrents.

Hope this helps.

Laura

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On Wed, Sep 7, 2016 at 5:30 AM, Don Staniford <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)> wrote:

Laura,

I am looking for data on mortalities of marine mammals (e.g. seals and sea lions) at salmon farms in the US.

Has anyone collated annual data since 2011 for Washington?

I see from the new US rule on the MMPA that:

"Annual estimates of marine mammal incidental mortality and serious injury resulting from aquaculture operations, when they are reported, are published in the annual marine mammal stock assessment reports.": <https://www.federalregister.gov/articles/2016/08/15/2016-19158/fish-and-fish-product-import-provisions-of-the-marine-mammal-protection-act#h-31>

And I think I can see the reports via <http://www.nmfs.noaa.gov/pr/sars/>

Are these the right reports here? <http://www.nmfs.noaa.gov/pr/sars/region.htm>

Presumably the US figure is very low if not zero. In any case, it would be useful to compare US data with Scotland (ca. 100 seals killed each year by salmon farms - and over [750 since 2011 when stats were first published](#)), Canada (data since 2011 [online here](#)), Chile, New Zealand, Australia, Norway etc.

Any help would be much appreciated.

Best fishes,

Don

Don Staniford

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



*Comment 13:* One nation asked what standard or measures the United States has implemented in its aquaculture facilities to avoid marine mammal bycatch, and what marine mammal mortality and serious injury rates are associated with U.S. aquaculture operations.

*Response:* U.S. marine aquaculture fisheries are currently Category III fisheries under the MMPA and are regulated under the regulations implementing the MMPA section 118 provisions governing the incidental take of marine mammals in all U.S. commercial fishing operations. These regulations also include provisions that prohibit the intentional killing and serious injury of marine mammals in commercial fishing operations. No U.S. marine aquaculture fishery is currently included under any marine mammal take reduction plan which would specify additional regulations specific to that particular aquaculture fishery (*e.g.*, California white seabass enhancement net pens). Annual estimates of marine mammal incidental mortality and serious injury resulting from aquaculture operations, when they are reported, are published in the annual marine mammal stock assessment reports.

NOAA's factsheet "[Seafood Import Provisions under the Marine Mammal Protection Act](#)" includes:

# Seafood Import Provisions under the Marine Mammal Protection Act

## Background

### Purpose:

The Marine Mammal Protection Act (MMPA) includes provisions to reduce marine mammal bycatch associated with fisheries that supply imports to the United States. Specifically, the MMPA requires that the United States ban imports of commercial fish or fish products caught in commercial fisheries resulting in the accidental killing or serious injury (bycatch) of marine mammals in excess of United States standards. NOAA has published a final rule containing regulation implementing these MMPA import provisions. These regulations establish conditions for evaluating a harvesting nation's regulatory program for reducing marine mammal incidental mortality and serious injury in fisheries that export fish and fish products to the United States. To import fish and fish products into the United States under this regulation, harvesting nations must apply for and receive a comparability finding. To receive a comparability finding nations exporting fish and fish products to the United States must demonstrate they have a regulatory program for reducing marine mammal incidental mortality and serious injury that is comparable in effectiveness to U.S. standards. To comply with U.S. standards, harvesting nations must implement a regulatory program that:

- Prohibits the intentional killing or serious injury of marine mammals in all fisheries; and
- Assesses marine mammal stocks, estimates bycatch, calculates bycatch limits, and reduces total bycatch below the bycatch limit for fisheries that have interactions with marine mammals and export fish and fish products to the U.S. ("Export Fisheries"); or
- Implements alternative measures for those fisheries.

A five-year exemption period has been provided to allow foreign harvesting nations time to develop, as appropriate, regulatory programs comparable in effectiveness to U.S. programs. During this time, NOAA will identify fisheries that have interactions with marine mammals and export fish and fish products to the U.S. and NOAA will consult with harvesting nations with such fisheries to gather information about their marine mammal bycatch.

[3]

**From:** Perry, Geoff [<mailto:Geoff.Perry@dfo-mpo.gc.ca>]

**Sent:** 13 September 2016 13:46

**To:** Don Staniford

**Subject:** RE: Data on marine mammal mortalities on salmon farms in Eastern Canada?

Good morning Don;

I do not have records for Eastern Canada, only for Newfoundland and Labrador (NL) Region.

Do you have a contact for the Maritimes Region of DFO? They would be the best contact for records in Nova Scotia and New Brunswick; I suggest Tammy Rose-Quinn, [tammy.rose-quinn@dfo-mpo.gc.ca](mailto:tammy.rose-quinn@dfo-mpo.gc.ca).

I am not aware of a national report that would have records similar to those produced in BC and Scotland. That being said, it is my understanding that there is a review underway to examine whether Canadian fisheries are in compliance with recently amended US marine mammal legislation.

Attached is an annual record of nuisance seal licences issued pursuant to the Marine Mammals Regulations in NL. It only indicates the number of licences issued and not the number of animals taken. To the best of my knowledge, use of lethal management measures to control seals at aquaculture sites has been a very rare event. However, I have a request in

to my Marine Mammal fisheries management colleagues to get any reported catch under these licences and the 2015-16 records and will forward anything they provide.

There could be four species of seals taken – harbour seal (known locally as bay seal), grey seal, harp seal, and hooded seal. Neither species is abundant in the areas where the salmonid aquaculture industry occurs and from a pragmatic perspective, use of such licences is a rare event in aquaculture.

There are no records of entanglements and no authorized use of lethal management measures for other marine mammal species. Purely coincidentally, we recently undertook a review of that issue given spatial expansion of the sector over the past decade and there are no records of marine mammal encounters with aquaculture gear from the Whale Release and Strandings Group that operates independent of DFO in this Region.

By way of context in the NL jurisdiction: every farming company must have a predator management plan as a component of their containment regime under the “Code of Containment for the Culture of Salmonids in Newfoundland and Labrador” and must apply for relevant federal or provincial licences as appropriate. With respect to seals, a company may make an annual or an as-needed application to the Department for a licence under Section 4 of the Marine Mammal Regulations for a “nuisance seal” licence. The locations where it may be used and other relevant details would be contained in licence conditions.

Note on other authorised fishing for seals in the general area where aquaculture operates in Newfoundland:

- Harp and hooded seals may be taken under personal use licences or under commercial licences in the commercial fishery for those species during the open season. Historically, effort and catches have been relatively small. As of 2012-13, there are 65 commercial and 76 personal use licences on the south coast (in contrast, there are ~11.8K commercial/personal-use seal licences in the NL region overall as of the same time period).
- Aboriginal communal fishing – a First Nation has a communal licence for seals that enables the taking of harp and grey seals for food purposes without a quota or limit and the taking of harbour seals for food subject to an annual catch limit of 20 seals.

I trust this will be helpful for your work.

Geoff

Geoff Perry  
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This is published online in Scotland and Canada:

<http://www.gov.scot/Topics/marine/Licensing/SealLicensing>

[http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/mar\\_mamm-eng.html](http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/mar_mamm-eng.html)

Comparable data for Ireland would be much appreciated.

Best fishes,

Don

Don Staniford

Director, Global Alliance Against Industrial Aquaculture (GAAIA):

<http://www.salmonfarmingkills.com>

[6] Back in 2005, a [legal opinion secured by the National Environmental Trust](#) (following the [slaughter of seals by Marine Harvest Scotland](#)) first raised the issue of a U.S. ban on imports of farmed salmon sourced from seal-killing salmon farms. The Sunday Express [reported](#) in December 2005:

# US to block seal cull farm salmon

**EXCLUSIVE**  
By **Meg Milne**

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

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

Amsterdam-based Marine Harvest, which predicts an annual turnover of one billion euros this year, ordered the cull after losing around 3,000 fish.

Marine Harvest, part of the giant Nutreco multi-national, which employs 6,000 people in eight countries, insist seals have must be shot to stop them attacking salmon at their Hebrides fish farm.

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

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

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

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

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

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

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

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

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



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

In 2012, The Sunday Express [reported](#):

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Picture: JOHN GILES/PA

# Fish ban call over seal culls

ANIMAL rights groups have called for a ban on Scottish salmon after new figures revealed that fish farms killed more than 300 seals in just one year. Campaigners say retailers have "blood on their hands" after the shocking extent of the legal cull was revealed after a Freedom of Information request. The data, supplied by Marine Scotland, showed hundreds of the mammals were destroyed over the 12 months to April. And now the activists are compiling a "name and shame" list of the firms, which "murder" seals "wholly unnecessarily". The Global Alliance Against Industrial Aquaculture (GAAILA) and the Save Our Seals Fund (SOSF) repeated the plea to ban salmon imports while asking supermarkets to stop sourcing "seal-unfriendly" fish. Don Staniford, of the GAAILA, said: "Scotland's seal killers should hang their heads in shame and hang up their guns." "Supermarkets such as Sainsbury's and Tesco, which condone the killing of seals by selling seal-unfriendly farmed salmon have blood on their hands." The SOSF Scotland has approached the US Department of Commerce to use existing legislation to ban the import of Scottish farmed salmon until they install seal exclusion nets. According to the groups, only a fifth of the country's fish farms use the predator nets, yet the law says the animals cannot be shot without a licence – and even then, destruction must be as a "last resort". But the Scottish Government insisted strict licensing means seals are given an "unprecedented level of protection". A spokeswoman said "few" animals target fish entering fisheries and nets, or attack farms, and added: "Licensing is necessary to control the removal of these seals, as a last-resort measure after any non-lethal alternatives have failed."

**By Paula Murray**



TARGETED: More than 300 seals have been killed in Scotland in the course of a year

[John Robins](#), Secretary of [Save Our Seals Fund](#) in Scotland, [said](#): "We have asked the US Department of Commerce to use existing US marine mammal protection laws to ban the import of salmon from Scottish floating factory fish farms. I hope the US Government can force Scottish salmon farmers to install seal exclusion nets, something the Scottish Government and the RSPCA have disgracefully failed to do. When you buy Scottish farmed salmon, even RSPCA-endorsed Scottish farmed salmon, you pay for bullets to shoot seals."



The Sunday Herald [reported](#) in September 2016:

"Campaigners also point out that the practice of killing seals to protect fish stocks is likely to fall foul of tough new laws on imports being introduced by the US. That could damage the £213 million market for Scottish salmon, they warn.....

Huyton pointed out that the US National Oceanic and Atmospheric Administration had last month agreed new rules to limit the import of fish. To comply with US standards, nations that want to sell to the US must have a programme that "prohibits the intentional killing or serious injury of marine mammals in all fisheries".

As Scotland officially licences the shooting of seals it was hard to see how it could comply, Huyton argued. The US is the top market for Scottish salmon, with exports of 41,000 tonnes worth over £213m in 2014.

Continued seal killing would damage Scotland's image abroad, he warned. "With the world now watching, inaction is simply not an option if Scotland's reputation as a country that respects and celebrates its wildlife is to be preserved."

Sarah Dolman, senior policy manager of Whale and Dolphin Conservation, described seal shooting as "Scotland's bloody marine secret". It was "proven to be cruel and it is unnecessary," she said. "The Scottish government should stop this inhumane activity."

Don Staniford, an anti-fish farming campaigner from the Global Alliance Against Industrial Aquaculture, called on fish farmers to install anti-predator nets around salmon cages, rather than reaching for guns. "Scottish salmon is shamefully drenched in the blood of dead seals," he said.

The US was likely to erect trade barriers to keep out Scottish salmon, he warned. "Instead of shooting themselves in the wallet, Scottish salmon farmers should hang up their guns and stop killing seals."

The fish farming industry pointed out that it was the only fisheries sector that was now promising to reduce the number of seals shot to zero. "The Scottish salmon farming industry takes very seriously its responsibility to animal welfare," said the chief executive of Scottish Salmon Producers' Organisation, Scott Landsburgh.

"It is our ambition to have enough techniques throughout the whole industry to avoid the need to shoot seals. In other words, it is our clear intention to reduce the number of seals shot to zero."

The industry was looking at the potential impact of the new US rules, Landsburgh added. "Unlike us, it should be noted there are other sectors within Scotland shooting seals that don't appear to have a public commitment to getting to zero."